



THE HOME BUILDERS FEDERATION

Date: 16th February 2015

Consultee ID: 105

Matter: 4F

BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION

MATTER 4F: AFFORDABLE HOUSING

Is the Council's approach to affordable housing consistent with the latest national guidance (NPPF/PPG)?

Question 4.5 Policy HO11 - Affordable Housing :

a. Is the approach to providing affordable housing appropriate, soundly based, justified with robust evidence, effective, deliverable, viable and consistent with national policy, particularly in terms of:

i. The latest Strategic Housing Market Assessment indicates an annual net shortfall of 587 affordable homes. How will this number of affordable housing be delivered, including the size, type and tenure of affordable housing and the means of meeting the objectively assessed need for affordable housing?

1. The inspector is referred to our comments upon matter 4a and the publication version of the plan.

ii. Policy HO11 sets targets for affordable housing of up to 30% in Wharfedale, up to 20% in towns, suburbs and villages, up to 15% in inner Bradford and Keighley, with site size thresholds of 15 dwellings (0.4ha) generally, lowered to 5 dwellings in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Hardern, Wilsden and Cottingley. Are these thresholds and targets fully justified and supported by an informed robust assessment of economic viability, and is there sufficient flexibility? Is the proposal to reduce site thresholds in certain areas consistent with the Government's recent announcement that lower thresholds should only apply in designated rural areas?

2. The threshold of five units is contrary to the Government's Ministerial Statement, 28th November 2014, which introduced a national affordable housing threshold of 10 units or development in excess of 1,000m² gross internal floorspace. Within designated rural areas, including national parks, areas of outstanding natural beauty and areas designated by the Secretary of State as being rural a lower 5 unit threshold can be applied. The HBF is not aware that this applies to the areas of Bradford where a 5 unit threshold is prescribed.

3. The PPG and written Ministerial Statement also provide for vacant building credits. This applies where a vacant building is either brought back into lawful use or is demolished to be replaced by a new building. In such cases a financial credit equivalent to the existing gross floorspace of relevant vacant buildings should be applied (PPG ID: 23b-022-20141128). For example if an 800sqm floorspace building is demolished and the new development has 1000sqm of floorspace, the affordable housing contribution sought should be a fifth of what would normally be sought.
4. In terms of the targets the *'Local Plan Core Strategy – Viability Assessment (EB045)* indicates that in all but the highest value markets across the plan area the proposed percentages of affordable housing are unviable (Table 4.22). Indeed even if the market picks up by 160% the 15% affordable housing target is unviable in the inner Bradford and Keighley areas (Table 4.24). The plan must be capable of delivering from its date of adoption, the HBF therefore contend that the targets are unsound. The update of the viability assessment (EB046) further highlights these issues within Table 4.12. The viability situation across the plan area is, however, significantly worse. Once the cumulative impact of all plan policies and obligations are considered a significant proportion of development within the area will be compromised. The *'Local Plan Core Strategy – Viability Assessment, (EB045)'* notes at paragraph 4.18.1 that;

'The cumulative impact of the proposed policy standards shows that even in the more viable parts of the District, the impact could be to compromise / undermine the delivery of development'.

This is a significant issue which the Core Strategy must address as failure to do so will render the plan undeliverable. The HBF are also concerned that the full costs of the Government's push towards zero carbon are not properly reflected. The Zero Carbon Hub publication *Cost Analysis of Meeting the Zero Carbon Standard*, (February 2014) suggests additional costs of between £6,700 to £7,500 for a detached house (118sqm) and £3,700 to £4,700 for a semi-detached house (76sqm). To accord with NPPF paragraphs 173 to 177 the Council should review all of its policy requirements as well as the costs of zero carbon to ensure that they do not unduly burden development.

i. Is the requirement to provide viability assessments to demonstrate that alternative affordable housing should be provided unduly onerous, inflexible and consistent with the latest national policy?

5. Paragraphs 173 to 177 of the NPPF and the PPG clearly identify that the cumulative effect of plan policies and obligations should not unduly burden developments. As discussed in our comments upon question 4.5a(ii) above we consider that the current viability evidence does not support the proposed level of affordable housing contributions being sought. In this regard, whilst the flexibility to negotiate is supported, the targets are considered unsustainable and contrary to the NPPF.

ii. Is the policy effective in terms of actually delivering affordable housing?

6. Whilst the policy will undoubtedly provide affordable housing delivery the current targets are considered unrealistic. The scale of affordable housing delivered is also unlikely to meet the affordable housing needs identified (see our matter 4a statement).

iii. Does the policy consider viability issues of providing affordable housing, or is it unduly onerous?

7. Part E of the policy indicates that the Council will negotiate where affordable housing contributions compromise the viability of sites. It does, however, appear that given the current level of contributions required the majority of sites will need to endure this negotiation process which will ultimately slow down development. Whilst the HBF is supportive of Part E it should not be used to retain an unsustainable policy. It is incumbent upon the Council to ensure that its policies are viable in the majority of cases with 'open-book' assessments retained for special cases only.

iv. Apart from delivering new affordable housing as a contribution from market housing schemes, what other measures will be available to deliver affordable housing through other means (eg, 100% schemes; RSL providers)?

8. The HBF has no further comments at this stage.

b. Is the approach to Rural Affordable Housing consistent with the latest national guidance (NPPF/PPG), including the threshold for affordable housing in rural areas?

9. The HBF has no further comments at this stage.

Matthew Good
Planning Manager – Local Plans
Email: matthew.good@hbf.co.uk
Tel: 07972774229