

**BRADFORD LOCAL PLAN CORE STRATEGY****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of Persimmon Homes (West Yorkshire)  
(Representor ID: 423)*****Matter 4F: AFFORDABLE HOUSING*****Preamble**

1. On behalf of our client Persimmon Homes (West Yorkshire), we write to provide comments in response to the Inspector's schedule of Matters, Issues and Questions in relation to the Bradford Local Plan Core Strategy. This follows our previous comments made on the Publication Draft of the Core Strategy in March 2014.
2. Our client is one of the UK's leading house builders, committed to the highest standards of design, construction and service. They have a large number of site interests across Bradford District and therefore are very keen to engage with the Council and assist in preparing a sound plan which is positively prepared, justified, effective and consistent.

**Persimmon Homes Site Interests in Bradford**

3. This is a list of our areas where our client has site interests:

Wharfedale

- Menston
- Ilkley/Ben Rhydding

Airedale

- Keighley
- Cottingley

Regional City of Bradford including Shipley and Lower Baildon

- Nab Wood (Shipley)
- Heaton (North West Bradford)
- Daisy Hill (North West Bradford)

4. These statements should be read alongside our previous written representations in relation to the emerging Core Strategy.
5. Our response to Matter 4F, which covers Affordable Housing, is contained in this statement. The key issue highlighted by the Inspector is:

**“Is the Council’s approach to affordable housing consistent with the latest national guidance (NPPF/NPPG)?”**

6. We consider below the specific questions asked by the Inspector:

**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?**

7. The net annual shortfall calculated within the 2013 *Strategic Housing Market Assessment* (“SHMA”) (EB/052) assumes that the backlog need is to be addressed over a 10 year period and this provides the annual net shortfall of 587 affordable homes. However a 5 year period to address the backlog need is more widely and commonly used by local planning authorities (and is indeed recommended by Central Government). On this basis the net annual shortfall would be greater at 1,302 dwellings annually.
8. Notwithstanding this, even on the basis of addressing the backlog over a 10 year period, 587 dwellings annually would require an affordable housing percentage of over 25% on developments coming forward to address this shortfall (based on 2,200 dwellings per annum). This would be over and above the requirements set out in Policy HO11 as the majority of the Council’s housing would be delivered in areas where the affordable housing requirement would

between 15% and 20%. Consequently the Council would not be able to deliver enough affordable housing to meet the identified need.

9. Where this is the case the NPPG recommends that increasing the total housing figures to be included in the local plan should be considered as this can help deliver a greater number of affordable homes. It states:

**“An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.” (ID-2a-029-20140306).**

- 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?**

10. As outlined in our previous representations on the Publication Draft of the Core Strategy, whilst our Client supports the notion of different affordable housing contributions in different areas of the district outlined in Policy HO11, we note from studying the Council’s *Local Plan Viability Assessment* and its associated update (EB/045 and 046) that the current proposals for affordable housing render developments in all areas apart highest value market areas as unviable even in the event of a significant pick-up in the market. On this basis the policy is unsound as it will be unjustified based on the Council’s own evidence.
11. This situation deteriorates further when the cumulative impact of the Core Strategy’s policies are taken into account with the *Local Plan Viability Assessment* stating:

**“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.”**

12. Indeed the push towards zero carbon homes contained within the plan (please see our comments on Matter 7B) will further render schemes unviable in the future on the basis of the affordable housing percentages required by Policy HO11 given the additional costs of meeting the zero carbon standard. To accord with paragraphs 173 – 177 of the NPPF (which state that the cumulative effect of plan policies must not unduly burden developments), the Council should review all of its policy requirements as well as the costs of zero carbon to ensure development is still viable across the district.

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

13. Whilst the policy allows for negotiation on the amount of affordable housing to be provided on a case by case basis (in relation to viability), as it currently stands, this would require the majority of schemes to go through this process which will further delay the delivery of much needed housing in Bradford.
14. To address this the Council should seek to reduce affordable housing levels to align with their viability assessment and to introduce further flexibility to allow for the payment of commuted sums towards affordable housing in the event that an on-site contribution is not appropriate.

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

15. In relation to our comments above, our client believes the current targets are unrealistic which inevitably means that the scale of affordable housing that will be delivered is unlikely to meet the affordable housing needs identified through the 2013 SHMA (EB/052).

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

16. As outlined above, the policy states that the Council will negotiate where affordable housing contributions compromise the viability of sites. At current levels however this will mean the majority of sites will need to undergo this process which will create delays in delivering much needed housing within Bradford and its district.

17. It should therefore be the case that Policy HO11 is amended so the majority of schemes can comply with the policy, leaving those which require viability appraisals to be the minority of cases.

**vi. 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)?**

18. Our client does not wish to provide comment at this stage.

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

19. Our client does not wish to provide comment at this stage.