

MATTER 4F: Affordable Housing

4F- AFFORDABLE HOUSING

Policy HO11 – Affordable Housing

Key issue:

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

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?
 - 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, Harden, 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?
 - iii. 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?
 - iv. Is the policy effective in terms of actually delivering affordable housing?
 - v. Does the policy consider viability issues of providing affordable housing, or is it unduly onerous?
 - 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)?
 - 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?
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As stated in our main submissions (March 2014) we support the general proportions of affordable housing on residential developments, set out in Part B providing that these are treated as maxima and are subject to viability.

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Since the Publication Draft was prepared changes in national guidance in relation to affordable housing result in Part C of Policy HO11 no longer complying with national guidance. On 28th November 2014 the Government amended the NPPG to introduce a 10-unit affordable housing threshold or a 5-unit threshold in designated rural areas (which include National Parks, AONB and other additional rural areas designated by order of the Secretary of State).

These changes at national level therefore result in the lower 5 dwelling threshold in Wharfedale, Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden and Cottingley in policy HO11 being contrary to national policy. This part of the policy should be amended accordingly.

In relation to viability – paragraph 173 of the Framework states:

“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.”

The Policy does allow for viability issues to be factored in on a site by site basis and the DTZ Viability Assessment has established different value areas and influenced the various percentage requirements of affordable housing to reflect the different market areas.

We consider the viability assessment requirement is not unduly onerous and subject to the modifications of the lower thresholds in Part C to align with national policy, the policy is capable of being effective and actually delivering affordable housing.