

Bradford Local Plan

Core Strategy Examination Session Day Six

Matter 4F: Affordable Housing

Date: 12th March 2015

Venue: Victoria Hall, Saltaire

Key issue:

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

Issue 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, 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?**
 - 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?**

- a. **Is the approach to providing affordable housing appropriate, soundly based, justified with robust evidence, effective, deliverable, viable and consistent with national policy,**

1. Council's Response

- 1.1 Access to affordable housing is a major issue in the District. Ensuring a sufficient supply of decent and affordable homes is a priority for the Council, and is identified as a key objective in the District's Housing Strategy (PS/B001b(vii), p.13-15) and a strategic aim in the Community Strategy (PS/B001b(i), p.13).
- 1.2 The Council consider that the approach to providing affordable housing in Policy HO11 is soundly based, justified with robust evidence, effective, deliverable, viable and consistent with national policy. Policy HO11 is intended to strike the necessary balance between meeting the identified need for affordable in the District and the economic viability of delivering affordable housing through developer contributions. This balance is necessary as by reflecting economic viability, the Council is ensuring that housing delivery as a whole is not being undermined as a result of the application of Policy HO11.
- 1.3 Policy HO11 has been informed by a robust and up-to-date evidence base including:
- Bradford Strategic Housing Market Assessment (SHMA) 2010 (EB050) and SHMA Update 2013 (EB052) in accordance with NPPF Paragraph 159
 - Bradford Affordable Housing Economic Viability Assessment (AHEVA) 2010 (EB023)
 - Local Plan Viability Assessment 2013 (EB045) and Viability Assessment Update 2014 (EB046) in accordance with NPPF Paragraphs 173-174.
- 1.4 A summary of the evidence base informing Policy HO11 is set out in Section 3 of Background Paper 2: Housing Part 2 (SD017).
- 1.5 A SHMA has been prepared to assess housing need in the District. The SHMA 2010 was prepared in accordance with *SHMA Practice Guidance Version 2*. The SHMA was updated in 2013 to ensure an up to date evidence base and to reflect the NPPF requirements. The SHMA Update 2013 methodology is considered to be consistent with the approach to assessing housing need outlined in the latest national PPG.
- 1.6 The AHEVA 2010 assessed the affordable housing targets and thresholds in Policy HO11 in terms of economic viability based on the previous requirement in paragraph 29 of *Planning Policy Statement 3 Housing 2011*.
- 1.7 In response to the requirements in NPPF paragraphs 173-174, a Local Plan Viability Assessment was produced in 2013 to support the Core Strategy. The Local Plan Viability Assessment 2013 was informed by guidance set out in *Viability Testing Local Plans 2012* by the Local Housing Delivery Group, and the RICS guidance note *Financial Viability in Planning 2012*. An update to the Viability Assessment was undertaken in 2014 to provide an updated assessment of the Core Strategy Publication Draft. The approach to viability testing is considered to be consistent with the general approach to viability and plan making in the latest national guidance in the PPG.

- 1.8 The Council has considered all of the evidence described above in formulating Policy HO11. The policy is therefore considered to be justified in that it provides the most appropriate strategy based on sound but proportionate evidence.

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?

2. Council's Response

- 2.1 The latest evidence in the SHMA Update 2013 indicates an annual net shortfall of 587 affordable homes across the District. To meet the identified need for affordable housing the Council will aim to ensure that 20 to 25% of the total housing delivery is affordable housing. The overall affordable target will be achieved by range of measures including utilising funding sources to support the delivery of affordable homes, maximising opportunities offered by Council owned land and through developer contributions.
- 2.2 Affordable housing targets for developer contributions are the main mechanism by which the Local Plan can have an influence on the provision of affordable housing. Not all of the identified affordable housing need will be met by developer contributions, as other methods of delivery such as grant funded schemes also play an important role in the delivery of affordable housing.
- 2.3 Given the high level of need, the Council will seek to secure affordable housing contributions from residential developments of new dwellings. This approach is in accordance with NPPF paragraph 50. This will be delivered through Part B of Policy HO11 which sets targets for affordable housing from new residential developments.
- 2.4 Criteria B sets targets for the percentage of affordable housing required on residential sites in three Affordable Housing Quota Areas. Core Strategy Figure HO2 shows the overall location and extent of the Affordable Housing Quota Areas (SD001, p.199).
- 2.5 The Council will seek affordable housing contributions from residential developments in accordance with the quotas in Criteria B and site size thresholds set out in Criteria C. The policy will be implemented through the development management process. The approach to Developer Contributions is set out in Core Strategy Policy ID3. Affordable housing contributions will be secured through Section 106 agreements, which are an established mechanism for securing affordable housing contributions.
- 2.6 Appendix 1 provides an estimate of the potential number of affordable homes which could be delivered through developer contributions based on achieving the targets in Policy HO11 Criteria B.
- 2.7 Criteria D sets out that the Council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability. The SHMA Update 2013

provides an analysis of the size, dwelling type and tenure profile for affordable dwellings in the district, in accordance with the NPPF paragraphs 50 and 159.

- 2.8 The affordable housing mix will be negotiated on a site by site basis having regard to the evidence in the most up to date SHMA, site suitability and any other relevant, robust and up to date evidence of local needs and/or economic viability.
- 2.9 As the Core Strategy is a strategic document, Criteria D is not unduly prescriptive and does not specify percentages of different affordable house sizes, types and tenures across the District. This approach allows for tenure and mix in terms of size and type of affordable housing to be determined on a site by site basis with regard to the latest evidence in the SHMA, site suitability and robust up to date local evidence of housing need.
- 2.10 The Council consider this approach to be justified and effective as it provides the flexibility to negotiate the affordable housing mix on a site by site basis and take into account site suitability and viability. This approach is consistent with NPPF Paragraph 50, which states affordable housing policies should be sufficiently flexible to take account of changing market conditions over time.

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?

3. Council's Response

- 3.1 The affordable housing targets and thresholds in Policy HO11 are considered to be fully justified and have been informed by the SHMA and tested through the AHEVA and Local Plan Viability Assessment, in accordance with evidence base requirements set out in NPPF paragraphs 159 and 173 and in line with the PPG approach to assessing housing need and viability.
- 3.2 The targets in Criteria B are considered to be justified based on a range of considerations including housing need, affordability, viability and the delivery of affordable housing through other sources. The Council consider that the affordable housing targets in Criteria B are justified, effective and positively prepared in terms of meeting housing need and considering viability as set out below.
- 3.2 Evidence in the SHMA Update 2013 indicates the Bradford District is a self contained housing market area (EB052, paragraph 3.3). NPPF paragraph 47 requires the council to use its evidence to ensure the Local Plan meets the full need for affordable housing in the housing market area.
- 3.3 In terms of housing need the SHMA Update 2013 identifies a District wide affordable housing need and estimates varying levels of need for affordable

housing within the 7 SHMA sub areas (EB052, p.79). The latest evidence in the SHMA Update 2013 identifies the highest affordable housing need within the city of Bradford and Keighley and Worth Valley sub areas. On the basis of a net shortfall of 587 affordable homes each year, the SHMA Update 2013 recommends an overall District-wide affordable target of 20%-25% (EB052, paragraph A.55).

- 3.4 In addition to housing need, NPPF paragraph 173 requires that affordable housing targets should also be determined with reference to economic viability.
- 3.5 Reflecting the varied housing characteristics of the Bradford District identified in the SHMA housing sub areas (EB052, p.9) and the value areas identified in the AHVEA (EB023, p24) and Viability Assessment 2014 (EB046, p.23) three Affordable Housing Quota Areas are identified (Core Strategy, Figure HO2 p.199). These are:
- Wharfedale
 - Towns, suburbs and villages
 - Inner Bradford and Keighley
- 3.6 The affordable housing targets in the Affordable Housing Quota Areas have been set in response to evidence of housing need and viability identified in these areas. This approach is set out in paragraphs 7.11 to 7.14 in Background Paper 2; Housing Part 2 (SD017). For instance despite evidence indicating the levels of housing need are greatest within the city of Bradford and Keighley and Worth Valley sub areas, the affordable housing target for these areas is reduced to 15% to reflect viability issues, while still helping to meet the high levels of identified need for affordable housing in these areas. The reason the target in Wharfedale is higher than the rest of the District reflects two further factors, firstly affordability and secondly the much lower proposed housing targets in this part of the district (see Policy HO3) and as a result the more limited number of opportunities to secure affordable housing contributions.
- 3.7 In response to viability issues identified in the AHEVA and Local Plan Viability Assessment the affordable housing targets are set as 'up to' targets to ensure they are sufficiently flexible to take account market conditions over the plan period. The targets are also subject to viability to ensure that the policy does not restrict deliverability as recommended in the Viability Assessment Update 2014 (EB046, paragraph 4.18.1). This is in accordance with NPPF Paragraph 50, which requires affordable housing policies to be sufficiently flexible to take account of changing market conditions over time.
- 3.8 The Viability Assessment Update 2014 concludes that the flexibility built into the wording of policies in the Core Strategy is such that they are not considered likely to put development viability at any serious risk across the District (EB046, paragraph 5.1.1).
- 3.9 In summary it is considered that Policy HO11 is justified and effective as it achieves an appropriate balance of setting affordable housing targets at a level which will help meet the overall need for affordable housing across the district, while taking into account economic viability and the need to be sufficiently flexible to take account of changing market conditions over time.

- 3.10 The Council considers the thresholds for affordable housing in Criteria C are justified in regards to evidence of housing need and viability. This is set out in paragraphs 7.15 to 7.17 in Background Paper 2: Housing Part 2 (SD017). The thresholds have been informed by the evidence in the SHMA 2010 which recommended lowering thresholds in Wharfedale and the villages (EB050, paragraph 6.19). The thresholds in Policy HO11 were tested in the AHEVA which found a site size threshold of 5 units on sites in higher value areas can produce developable, deliverable sites (EB023, paragraph 11.38). On the basis of the latest evidence of housing need, the SHMA Update 2013 indicates that existing affordability targets and thresholds remain relevant (EB052, paragraph A.55).
- 3.11 The site threshold of 5 units in Criteria C is not considered consistent with the change to the national PPG that states affordable housing contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm (PPG Paragraph: 013 Reference ID: 23b-013-20141128). The Council consider the areas identified in Criteria C do not classify as designated rural areas described under section 157(1) of the Housing Act 1985, where local planning authorities may choose to apply a lower threshold of 5-units.
- 3.12 To be consistent with the latest advice in the PPG the 5 unit threshold in Criteria C would need to be modified to reflect the new minimum threshold. This would have implications for delivery of affordable housing in Wharfedale and rural villages of the district, where larger sites are more limited. However, a higher threshold is likely to improve the viability of delivering smaller sites within these areas.
- 3.13 However, the Council is of the opinion that the change to PPG is not policy as it is not included in the NPPF which sets out national planning policy. In this respect the council consider that a lower threshold than 15 dwellings is justified in the areas listed in Criteria C in terms of both need and viability evidence.

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?

4. Council's Response

- 4.1 The Council do not consider the requirement to provide a viability assessment where a reduction in affordable housing is being sought unduly onerous.
- 4.2 NPPF Paragraph 50 requires the council to set policies for meeting identified housing need on site, while ensuring such policies are sufficiently flexible to take account of changing market conditions over time.
- 4.3 The Viability Assessment Update 2014 indicates that with the benefit of a return to peak market conditions, the proposed standards in Policy HO11 are viable if considered independently of other standards and obligations (EB046, paragraph 4.16.2) and under mid market conditions the affordable housing standard is viable in the majority of the District apart from the lowest value area 5 (Viability Assessment Update 2014, Affordable housing outputs). However, the cumulative impact of all the policy standards tested could be to compromise the delivery of development. The Viability Assessment therefore

highlights the importance of a flexible approach to the way that policies are implemented with a 'subject to viability' review mechanism.

- 4.4 However, it is also important to note that the Local Plan Viability Assessment only provides an approximate indicator of viability (EB046, paragraph 2.3.3). For instance when assessing the cumulative impact standards the Viability Assessment Update 2014 notes that not all areas will be required to meet all standards policy standards and improved market conditions and cost efficiencies could enhance viability for certain standards, such as zero carbon housing (EB046, paragraph 4.15). Also within each value area there will be variations in values achieved. It is therefore important to stress that not every development will be required to submit a viability assessment and that the use and need for viability assessments is likely to decrease over time presuming market conditions and sales values improve.
- 4.5 In response to the recommendations in the Viability Assessment Update 2014 and to ensure delivery through the plan period Criteria E sets out that the affordable housing targets in Criteria B are subject to viability. This will ensure Policy HO11 is not unduly rigid and will allow development to come forward, as it allows for the viability and circumstances of individual sites to be taken account of in the determination of the affordable housing contribution being sought.
- 4.4 The Council recognise that delivering housing in certain areas of the District remains challenging due to scheme viability (primarily the urban/inner city areas of Bradford and Keighley). However the approach to viability is considered justified, particularly in the early part of the plan period in order to ensure development can come forward while still meeting housing need where viable. The Viability Assessment Update 2014 concludes that the inherent uncertainty of predicting future market conditions underlines the importance of the pragmatic and flexible approach reflected in the wording of the Core Strategy policies (EB046, paragraph 5.1.3).
- 4.5 This approach is considered consistent with the latest national PPG on viability and planning obligations which states:
- that affordable housing contributions should not be sought without regard to individual scheme viability (PPG Viability Paragraph: 020 Reference ID: 10-020-20140306)
 - that where affordable housing obligations are required Local Planning Authorities should be flexible in their requirement (PPG Planning Obligations: Paragraph: 007 Reference ID: 23b-007-20140306)
 - to support negotiations on individual schemes applicants should submit evidence on scheme viability where obligations are under consideration (PPG Planning Obligations: Paragraph: 008 Reference ID: 23b-008-20140306).
- 4.6 Over recent years the Council has operated a positive and flexible approach to developer contributions, which recognises that affordable housing contributions may need to be lowered or waived where viability issues have been identified with the aim of securing the delivery of new housing on economically challenging sites. This approach is set out in two Council reports on delivering planning obligations during the economic downturn.
- 4.7 On 7th December 2009 the Regulatory and Appeals Committee considered a report concerning the impact of S106 Agreements and the ability for developers to meet requested contributions given the economic downturn in

the house building market. This report sets out the Council's approach to adopting a flexible approach when determining the level of developer contributions, based on developers' financial appraisals (Report of the Assistant Director (Planning) to the meeting of Regulatory and Appeals Committee to be held on 7th December 2009, paragraphs 2.1 to 2.10).

- 4.8 A report was considered by the Executive on 24th June 2014 on the utilisation of the New Homes Bonus to reconcile competing demands on S106 contributions to deliver affordable housing, social and school infrastructure. The report notes in that there is evidence that the Council's stance to allow a flexible approach to S106 contributions has provided dividends with continued house building on some challenging sites (Report of the Assistant Director (Planning, Transportation and Highways) to the meeting of the Executive to be held on 24th June 2014. paragraph 3.7). However, the report recognises that any continued upturn in developer confidence in Bradford will, on many sites, still require assistance by the Council in the form of a flexible approach to S106 contributions as many sites retain scheme viability issues.
- 4.12 However, the report notes that any decision to allow reduced S106 contributions must involve developers demonstrating proven scheme viability issues (Report of the Assistant Director (Planning, Transportation and Highways) to the meeting of the Executive to be held on 24th June 2014., paragraph 3.8). The current procedure requires developers to submit a viability assessment demonstrating which contributions can and cannot be met and this is appraised by specialist Council officers. This continues to remain the Council's policy.
- 4.13 The flexible approach in Policy HO11 is therefore considered justified as it allows the Council to consider varying planning obligations where justified by viability evidence and allows the Council to assess local priorities of competing planning obligations on a site by site basis.
- 4.14 This approach has successfully allowed development to come forward over the last five years whilst still delivering affordable housing to meet need where viable.

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

5. Council's Response

- 5.1 The Council consider that Policy HO11 will be effective in delivering affordable housing, through developer contributions and through other funding sources. Delivering affordable housing through developer contributions in accordance with different targets across the District is an established approach in the current Development Plan, through Policy H9 in the Replacement Unitary Development Plan (RUDP) 2005. Appendix 2 shows the total affordable housing completions for the last five years (this includes affordable housing delivered through developer contributions and other funding sources). This table demonstrates that despite challenging economic conditions and generally much lower levels of total housing completions, a significant percentage of affordable housing has been delivered. It is anticipated that the total amount of affordable housing including the amount of affordable housing delivered through S106 agreements will increase alongside projected increases in total housing completions in line with the housing trajectory (SD001, Appendix 6), in particular as larger sites are brought forward over the plan period.

- 5.2 Policy HO11 is considered effective as it sets affordable housing targets at a level which will help meet the identified need for affordable housing in the District and is sufficiently flexible to enable delivery over the plan period in accordance with NPPF paragraph 50.
- 5.3 It is also considered that Policy HO11 will be effective in delivering the majority of affordable homes in locations where they are most needed. The evidence in the SHMA Update 20013 identifies the highest affordable housing need within the city of Bradford sub areas and Keighley and Worth Valley. As the distribution of the Core Strategy housing requirement (Policy HO3) is heavily focused on the larger urban areas and settlements within the District, the majority of the affordable homes secured through developer contributions are likely to be delivered in areas of highest need and the most sustainable locations in terms of access to jobs and facilities (see Appendix 1).
- 5.3 The supporting text to Policy HO11 in paragraph 5.3.172 also highlights that in order to meet the overall district wide affordable housing target, grant funding and any other forms of subsidy and funding for affordable housing should be directed towards development in the areas of highest need.

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

6. Council's Response

- 6.1 The targets and thresholds in Policy HO11 have been informed by viability throughout the plan process, firstly through the AHEVA 2010 and then the Local Plan Viability Assessment. The Council's approach to balancing viability and deliverability against development standards is highlighted in the Viability Assessment (EB046, paragraphs 5.1.1 to 5.1.4). This reflects the iterative process of developing plan policies in regards to viability as set out in the national PPG in relation to viability and plan making (PPG Viability Paragraph 006 Reference ID: 10-007-20140306).
- 6.2 The affordable housing targets and thresholds have been informed by viability evidence and reflect viability issues identified in different parts of the District as set out in paragraphs 7.11 to 7.17 of Background Paper 2 (SD017).
- 6.3 As set out in the Council's response to part ii of question a (paragraphs 3.1-3.7) the affordable housing targets and thresholds are set at a level which is considered viable and deliverable over the life of the plan, while still helping to meet the identified housing need as required in NPPF paragraph 50. The targets are subject to viability and the policy is flexible to respond to changing market conditions throughout the plan period. The Council therefore do not consider Policy HO11 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)?

7. Council's response

- 7.1 In addition to developer contributions to affordable housing, the Council will utilise and support a range of measures to deliver affordable housing in the District. These will include:

- Registered Providers' (RPs) programmes of affordable housing development and the Council's new build programme on council owned land delivered through Affordable Housing Programme (AHP) funding
 - maximising the potential of bringing empty homes back into use in order to meet the District's demands for housing, including affordable homes
 - developing new models of funding for affordable homes including utilising cross-subsidy, commuted sums, New Homes Bonus and prudential borrowing
- 7.2 The Council's Housing Strategy sets out the Council's delivery approach for affordable housing (PS/B001b (vii), p.15).
- 7.3 In regards to funding for affordable housing the 2015-18 AHP bid submission identifies the AHP 2015-18 allocations secured from Homes and Communities Agency by all RP's operating within the District, including Bradford Council. In total funding for 766 units has been secured (AHP 2015-18).
- 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?**

8. Council's Response

- 8.1 It is considered that the approach to rural affordable housing in Policy HO11 is consistent with NPPF paragraph 54. Policy HO11 will aim to meet the need for affordable housing in rural areas through setting lower thresholds in Criteria D and setting out the Council's approach to Rural Exception Sites in Criteria F and G.
<http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/6-delivering-a-wide-choice-of-high-quality-homes/> - paragraph 54
- 8.2 The site threshold of 5 units in Criteria C is not considered consistent with the change to the national PPG that states affordable housing contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm (PPG, paragraph 12. The Council consider the areas identified in Criteria C do not classify as designated rural areas described under section 157(1) of the Housing Act 1985, where local planning authorities may choose to apply a lower threshold of 5-units.
- 8.3 The new restrictions on seeking planning obligations contributions in the PPG do not apply to development on Rural Exception Sites (Paragraph: 014 Reference ID: 23b-014-20141128). Criteria F and G relating to Rural Exception Sites are therefore considered consistent with the latest PPG.

Appendix 1: Estimated Affordable Housing Delivery through Developer Contributions

	OPTION 6			Affordable Housing	
	Settlement	Total	%	%	Total Units
Bradford	City Centre	3500	8.3	15.0	525
	Shipley / Canal Rd Corridor	3200	7.6	17.5	560
	NE	4700	11.2	17.5	822.5
	SE/Holmewood	6000	14.3	17.5	1050
	SW	5500	13.1	15.0	825
	NW	4500	10.7	17.5	787.5
	Shipley	1250	3.0	20.0	250
	Total	28650	68.1	16.8	4820
Principal towns	Ilkley	800	1.9	30	240
	Keighley	4500	10.7	17.5	787.5
	Bingley	1400	3.3	20	280
	Total	6700	15.9	19.5	1307.5
Local Growth Centres	Queensbury	1000	2.4	20	200
	Silsden	1000	2.4	30	300
	Steeton	700	1.7	30	210
	Thornton	700	1.7	20	140
	Total	3400	8.1	25.0	850
Local Service Centres	Addingham	200	0.5	30	60
	Baildon	450	1.1	20	90
	Burley	200	0.5	30	60
	Cottingley	200	0.5	20	40
	Cullingworth	350	0.8	20	70
	Denholme	350	0.8	20	70
	East Morton	100	0.2	20	20
	Harden	100	0.2	20	20
	Haworth	500	1.2	20	100
	Menston	400	1.0	30	120
	Oakworth	200	0.5	20	40
	Oxenhope	100	0.2	20	20
	Wilsden	200	0.4	20	40
	Total	3350	8.0	22.4	750
		42100	100.0	18.4	7727.5

OVERALL TOTAL 42100

Note: This table provide an estimate of affordable homes which could be delivered through developer contributions based on the targets in Policy HO11 over the Plan Period.

Where a settlement covers two Affordable Housing Quota Areas an average of the two targets has been applied

Appendix 2: Total Affordable Housing completions for the last 5 years

Year	Total Affordable Housing Completions	Total net Housing Completions
2009/10	322	999
2010/11	204	696
2011/12	198	733
2012/13	196	721
2013/14	279	874

Notes: CBMDC annual monitoring data and data supplied by the Affordable Housing Team