



THE HOME BUILDERS FEDERATION

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BRADFORD LOCAL PLAN CORE STRATEGY EXAMINATION **MATTER 7B: HOUSING – FURTHER STATEMENT ON POLICY HO9** **HOUSING QUALITY (HOMEWORK ITEM: PSF069)**

1. The HBF wish to submit the following comments upon homework item PSF069 produced in relation to the Bradford Core Strategy Examination. The HBF has only commented upon a few specific homework items. The fact we have not commented upon a particular item should not be taken as agreement with any proposed modification. The HBF reserve the right include additional comments upon any subsequent main modifications consultation.
2. The Council proposes a number of amendments to policy HO9. These are made in response to the ministerial statement (25th March 2015) and amended PPG. The initial response of the HBF to each amendment are set out below.

Building for Life Standards

3. The HBF encourages the use of Building for Life 12 (BfL12) to aid discussion upon design issues. Whilst the HBF is supportive of BfL12 and many of our members accord to its requirements it is important that it does not become mandatory for all developments as this would remove flexibility.
4. The HBF recommend the following amendment to paragraph 5.3.136;

*.....'Applicants for residential developments of over 10 units **are strongly encouraged to submit their own evidenced Building for Life 12 assessment for consideration to form the basis for discussions on design quality**'*

Zero carbon

5. The proposed modifications indicate the Council will encourage and support developers to go beyond the national minimum standards and will require zero carbon homes from 1st April 2016 (or national equivalent).
6. The ministerial statement indicates that the national zero carbon homes policy will not be introduced until late 2016 and;

‘.....from then, the energy performance requirements in Building Regulations will be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until the amendment is commenced, we would expect local planning authorities to take this statement of the government’s intention into account in applying existing policies and not set conditions with requirements above a Code level 4 equivalent.’

7. The Council is seeking to introduce the zero carbon standard in advance of their national implementation. The ministerial statement specifically relates to **existing** policies, not emerging policies. The HBF therefore considers the early introduction of such a requirement to be contrary to the ministerial statement. The early introduction would also incur additional unnecessary costs at a time when many parts of Bradford suffer from significant viability problems and there is a need to boost housing supply.
8. The HBF recommend that the early introduction be deleted and the following amendments are made;

Policy HO9 Part B. ‘The Council will encourage and support new residential developments to achieve high sustainable design and construction standards. The minimum acceptable sustainable housing standards are set out within the Building Regulations.’

Paragraph 5.3.138. ‘Under Criterion B the council will encourage developers to bring forward proposals which meet high standards of sustainable design and construction which should at least meet the prescribed national standards at the time of application’.

Paragraph 5.3.139. ‘Whilst not a policy requirement the council will encourage and support developments which exceed the national minimum sustainable housing standards, particularly energy efficiency standards. The council will also support the use of on-site renewable or low carbon energy generation, where appropriate and feasible, to help meet the energy requirements of the development and further reduce carbon emissions.’

Accessible Homes

9. Part C requires a proportion of developments on larger sites to be accessible. Amended paragraph 5.3.41 expands upon this suggesting sites of 10 or more provide a proportion of dwellings which surpass the minimum standards for access, although regard will be had to viability. Paragraph 5.3.42 explains further work will be undertaken in this regard and a percentage requirement introduced through the Housing Design Guide in advance of a local plan policy.
10. The HBF supports the need for accessible homes but consider the Council’s position contrary to the ministerial statement and the PPG, both of which are clear that such requirements must be set within a local plan and the evidence appropriately examined. The Council cannot introduce a policy requirement through an SPD, as this would not only be contrary to

the intended introduction of the optional standards but also the role of SPDs.

11. The PPG (ID 56-007-20150327) identifies which criteria must be considered through the examination process. The PPG also advises plans should provide targets (ID 56-008-20150327). The Council (paragraph 4.13 PSF069) clearly indicate additional work is required to justify the requirement. Therefore the Core Strategy cannot place any such requirement upon new developments. The HBF recommends that the policy and supporting text be further modified to simply indicate the Council will encourage and support the provision of dwellings which exceed the national minimum accessibility standards.

Space standards

12. Part E refers to internal space standards. The proposed amendments to supporting paragraphs 5.3.145 to 5.3.150 identify that this relates to the recently announced national standard. The paragraphs further note new developments will be benchmarked against the national standard to assess suitability. Thus indicating a requirement for such standards to be achieved, as discussed at the hearing sessions this could have a significant impact upon viability within Bradford.

13. The PPG (ID 56-020-20150327) clearly indicates the introduction of the internal space should be justified and examined through a local plan and provides the relevant assessment criteria, including an impact upon viability and affordability test. The Council within amended paragraph 5.3.150 note further work is required prior to the formal introduction of this standard.

14. Given additional work is required to justify the introduction of the national internal space standard it is recommended that reference to the standard be removed from the policy and supporting text.

Conclusion

15. The HBF does not consider that the evidence base which underpins the Core Strategy provides sufficient justification for the introduction of the optional standards. The appropriate mechanism, presuming they can be justified by additional evidence, would be through the subsequent Allocations DPD anticipated for adoption in 2017.

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