

Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

For Office Use only:	
Date	
Ref	

PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.
(Additional Part B forms can be downloaded from the web page)

4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM17

5. Do support or object the proposed main modification?

Support

Object

Object

6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

Unsound

8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

Unjustified

Effective

Consistent with National Planning Policy (the NPPF)

9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

There is no justification for greenbelt deletions as the housing numbers exceed the number of households projected by the DCLG/ONS. The job creation projections have been revised downwards by the Council (MM65) therefore its original assumption that people would be drawn to the area in search of work (and inflate the population beyond the projections of both the DCLG and the ONS) can no longer be supported. DCLG projections on population growth and household formation should be accepted and housing numbers set accordingly (30,000 maximum). This removes any necessity to delete greenbelt for housing.

In addition, the strategy of planning houses in the greenbelt undermines the Council's ability to meet actual housing needs in full for reasons relating to the market (see evidence below). The proposed housing mix is inappropriate for this population on a number of counts.

The DCLG household projections presented in Table 1 show the number of households increasing by 35,000 across the 19 years between 2011 and 2030 (the period on which Paper 3 bases its jobs growth figure of 27,000 FTE) and by 41,000 between 2007 to 2030 (the 23 year period that includes 2007 to 2015 against which shortfalls might be reckoned). The data shows that given delivery to date a target of 30,730 minus any 2015/16 builds and conversions would meet residual, as well as emerging, housing needs (a maximum of 30,000 homes net). The income data and developer house price data in the Appendices sent with this submission shows an affordability gap between new build prices and wages. This means that the bulk of these houses will not be delivered. There is not the customer base for them.

Table 1 Additional households against new homes delivered by year DCLG Household projections from Live Table 406 at 09/01/2016 and New homes from DCLG Live Table 122

Year	DCLG Number of households BDMC area	New homes Required/additional households	New homes: new builds & conversions	Shortfall/yet to be delivered
2007/08	194,000	2,000	1400	600
2008/09	196,000	2,000	2200	Minus 200
2009/10	198,000	2,000	1760	240
2010/11	200,000	2,000	1460	540
2011/12	201,000	1,000	730	270
2012/13	202,000	1,000	720	280
2013/14	204,000	2,000	870	1,130
2014/15	206,000	2,000	1130	1,000
2015/16	207,000	1,000	Not included yet	2,000
2016/17	209,000	2,000		2,000
2017/18	211,000	2,000		2,000
2018/19	213,000	2,000		2,000
2019/20	215,000	2,000		2,000
2020/21	217,000	2,000		2,000
2021/22	219,000	2,000		1,000
2022/23	220,000	1,000		2,000
2023/24	222,000	2,000		4,000
2024/25	226,000	4,000		2,000
2025/26	228,000	2,000		2,000
2026/27	230,000	2,000		2,000
2027/28	232,000	2,000		2,000
2028/29	234,000	2,000		1,000
2029/30	235,000	1,000		1,000
TOTAL:	235,000	41,000	10,270	30,730
Less any delivery 2015/16 estimated at a minimum of 730				30,000

See also Appendix 1 & 2 which accompany this document but cannot be attached because they are in landscape format

The proposed mix (and price of housing) will not meet local needs

Ensuring the housing delivered meets needs

Meeting objectively assessed housing needs in full involves not only supplying the right number of homes but also providing the range required to meet the needs of those who are unable to buy or rent on the open market and the aspirations of those with the means to enter or trade up or down within it.

It is clearly inappropriate to the point of being improper to portray the discounted housing planned for Wharfedale as being 'affordable'. 750 homes constitute over 7% of the total that it is hoped will be delivered if the Plan aims to ensure that 25% of all new homes will be. However, the issue is not limited to Wharfedale. It pervades the whole spatial strategy which places a disproportionate number of homes in communities with the highest property prices and in the greenbelt where even when offered at a discount they are likely to cost more than their equivalents on the open market in urban Bradford and Keighley.

It is beyond improper when one considers that these communities are not, in the main, major centres of employment and that low earners need to keep commuting costs to a minimum in order to survive financially. This Plan puts a hefty proportion of the 'affordable' housing out of reach of those who need it on two counts.

However, it is not just the 'affordable' housing that is problematic, the entire price structure proposed for the new builds is radically out of line both with earnings in the District and with the underlying price of the existing housing. There will not just be too few customers to buy 46,100 of these houses, there won't even be the customers to buy 30,000. And the developers involved in the plan making exercise know this. They are not attempting to meet demand (or need) but are focused on a small segment at the highest end of the market in pursuit of a high margin, low output strategy that yields enormous profits; and they will limit their efforts to building those houses they can sell at the margins they want. And it does not matter how much land, or how many planning permissions they have, the outcome will still be the same under this Local Plan. Many people who need homes will not get them.

Since owner occupiers comprise the bulk of purchasers and most tend to buy with a mortgage based on their salary and trade up when they have accrued equity, what they need is a product that is in line with wages and general property prices. Bradford has a low wage economy and a stagnant property market that has not recovered from the property crash of 2008-9. Table 2 overleaf shows the spread of salaries locally (taken from the 2013 ASHE data) and the mortgages these could raise and Table 3 (Appendix 1) contrasts property prices and transaction rates across various parts of the District in 2007/8 and 2014/15. The latter clearly shows the market fell, that it has remained low and that at 2015 it was characterized by negative equity. It still is. The most recent mean prices cited on the Land Registry for Bradford are given below, alongside those for February 2008:

Land Registry Mean Property Prices for Bradford November 2015				
Mean all property	Detached	Semi-Detached	Terrace	Flat
£95,704	£211,223	£101,789	£68,808	£88,147

Land Registry Mean Property Prices for Bradford February 2008				
Mean all property	Detached	Semi-Detached	Terrace	Flat
£123,670	£272,944	£131,533	£88,914	£113,045

NB The statistic favoured by developers (overall mean sold price) is subject to transactional bias which can make it appear as though house prices are rising even when they are falling because transactions are increasingly

concentrated at the upper end of the market when people in negative equity cannot sell their homes.

Table 2 Bradford Weekly pay by Bradford Parliamentary Constituency and Yorkshire and Humber (in GB pounds)

Weekly wages for full-time employees taken from ASHE data 2013 (Revised) and based on PAYE records from HMRC

NB these figures are for full-time adult employees (excluding the self-employed) and refer to basic pay (they do not include overtime)

All figures are in pounds sterling

Area	Mean	25 th Percentile	Median (50 th Percentile)	75 th Percentile
Yorkshire & Humber	537.4	334.2	454.4	640.1
Bradford East	464.4	316.2	422.0	532.9
Bradford South	454.0	313.4	400.3	522.2
Bradford West	437.2	300.1	354.3	536.8
Keighley	577.4	334.2	498.3	645.0
Shipley	556.2	364.2	484.7	669.8

Mortgage that could be raised by a single wage earner at 3.5 times annual earnings

Area	Mean	25 th Percentile	Median (50 th Percentile)	75 th Percentile
Yorkshire & Humber	92,807	60,824	82,701	116,498
Bradford East	84,521	57,548	76,804	96,988
Bradford South	82,628	57,039	72,855	95,040
Bradford West	79,570	54,618	64,483	97,698
Keighley	105,087	60,824	90,691	117,390
Shipley	101,228	66,284	88,215	121,904

Compare the figures in Tables 2 and 3 with the figures in Table 4 (Appendix 2) which shows the spread of new-build house prices taken from the Bradford CIL Viability Evidence Addendum (December 2015). It is apparent that the prices the developers are currently seeking, and are likely to continue to seek, are beyond the means of all but a tiny proportion of the would-be purchasers who actually have a job, and many people in Bradford won't. **MM67** states: 'it is estimated that by 2030 55,298 (15.7%) of the working [age] population will be claiming out of work benefits'.

Neither will these houses be bought by buy-to-let investors who favour cheaper properties and can get them in this market.

So, many of the homes Bradford is planning at each price point are not going to be delivered. Incidentally the Leeds Local Plan makes many of the same errors seen in Bradford's: Leeds has inflated housing numbers out of line with population and jobs growth projections, it is planning housing on greenbelt sites unnecessarily and it too has failed to recognize that it has a stagnant property market carrying high levels of negative equity. The Land Registry puts current mean property prices for Leeds at £132,751 (the latest figures are for November 2015), the peak of the market there was in/around December 2007 when it hit £152,051. Any expectation Bradford Officers have that hordes of buyers from Leeds will mop up expensive homes built here are unlikely to

be met. The North Yorkshire housing market is better but still below its pre-crash peak.

Beyond this, the general housing mix proposed in the plan is wrong given the household projections from the ONS/DCLG. These show a fall in household size across the plan period largely as a result of an increase in the number of single person households. ONS/DCLG projections for Bradford show headship rates in 2012 at 2.58 falling to 2.47 in 2027 and 2.43 in 2032, this is one reason that the projected growth in household numbers across the Plan period is as high as 27,000. In addition, the 2011 Census showed that taken collectively one and two person households were already more common than other configurations. This shows a demand for one and two-bedroom property that will not be met by this plan and, judging by the analysis of sites presented in relation to the CIL, a market the big developers are reluctant to cater for.

‘We have got some money from the Government over the next three years to build affordable housing in the area [Bradford]. The issue in Bradford is that some of the private developers do not want to build houses where the Council wants them to. They would like to build on greenfield areas in Airedale and Wharfedale instead.’

Councillor [redacted] Slater (Deputy Leader of Bradford Council) Telegraph and Argus 22/09/2015

Wharfedale, as Councillor Slater pointed out in the Telegraph and Argus piece quoted above, is the key target for developers. This is primarily because the majority of customers for homes here are not Bradford residents and most people buying into Wharfedale are not reliant on Bradford’s economy for their incomes. Reports underpinning the Plan show that there is little transfer between the Wharfedale and Bradford housing markets and the price differentials are such that trading up to Wharfedale is not generally an option for people there, not even those from the more affluent areas. Some people move out from Leeds but many others work nationally or internationally and an increasing proportion are retirees drawn from far afield by the joint attractions of the National Park and Leeds. There is an increasing, and deeply worrying, tendency for developers to specifically target this retirement market. Age restricted properties have sprung up all over Ilkley in the past two decades, the most recent being a retirement village at Ben Rhydding. Planning applications have also been submitted for retirement housing in the grounds of Craiglunds Hotel and on the former Spooner site in the town centre. These developments are not designed to meet local needs. The price of the property at Ben Rhydding for example is excessive by local standards and the fees, at almost £700 per month minimum, would discourage locals in large houses from selling up and moving there. They would be better off staying put, closing off parts of their home and engaging a local homecare agency. It is not prudent in a Local Authority to encourage this. Aging people are expensive (for example even affluent older people tend to use NHS services and the bulk of spend on an individual generally occurs in their twilight years). They contribute relatively little to local economies. They do not contribute their skill set to local businesses and they are low volume and highly selective shoppers. The more energetic spend a lot going on holidays to other places. I do not have the data to hand but used to work with East Sussex Council and the NHS PCT and spent many meetings where the principal topic was what we should do about ‘the Eastbourne effect’ which can roughly be summed up as too many octogenarians. To cap it all, people living in Wharfedale do not even shop in Bradford, their primary city of reference is Leeds.

All this makes Ilkley, together with the rest of Wharfedale and Silsden, particularly vulnerable to over-development. Development moreover that is likely to undermine the existing visitor based economy (Ilkley has the most thriving retail patch in Bradford District and it is visitor driven) and destroy its potential to deliver the benefits of a genuine growth industry, tourism. Put simply, our visitors will not want to come to an elongated sprawl with a business park at one end where the only route through is a bottleneck on the A65. They are attracted by the landscape and the charm of the town.

The Council is clearly in disarray on the matter of identifying and addressing the full range of housing needs therefore the plan does not meet the requirement to address needs in full. Further issues are as follows:

- It is not clear precisely what the current proposals are with respect to affordable housing because the Council does not have an up-to-date affordable housing strategy. The Council website flags that its Affordable Housing SPD supports the saved policies (H9 and H10) from the RUDP (drafted in 2005) and the Main Modifications make reference to the RUDP policy H011. The website also carries two reports which appear to be from 2008 (SPD: District Wide Affordable Housing Scoping Report and SPD: Sustainability Appraisal Scoping Report – Draft for Consultation) and are therefore out of date.
- The original proposals cannot now be implemented because they assumed that a hefty percentage of affordable housing in high value settlements would be social rented (28% in the case of Wharfedale). The Bill currently going through Parliament will render that impossible as it will force Councils to sell off property in expensive areas. Housing Associations will have to offer tenants the right to buy so will be highly unlikely to build in them.

10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.

You need to say why this change will make the proposed main modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Delete it.

11. Signature:

[Redacted Signature]

Date:

20/1/16

Thank you for taking the time to complete this Representation Form.