

Local Development Framework for Bradford

Bradford City Centre Affordable Housing Supplementary Planning Document

Supporting Documents

Statement of Consultation

Statement of Sustainability Appraisal

October 2008



City of Bradford MDC

www.bradford.gov.uk

1.0 Statement of Consultation

1. The Bradford City Centre Affordable Housing SPD sets out the Council's approach to the implementation of Policy H9 of the Replacement UDP.
2. This Statement of Consultation has been prepared in accordance with the Town and Country Planning (Local Development) (England) Regulations 2004, and the summary of representations and the Council's response can be found in below.
3. The draft SPD has been the subject of consultation, as resolved by Executive Committee on 16 January 2007. This consultation period ran from 2 April to 14 May 2007.
4. In line with the Regulations, and the Statement of Community Involvement (as submitted), the draft SPD and accompanying documents:
 - were made available at the Area Planning Offices in Bradford Shipley and Ilkley, and at the Keighley Information Centre;
 - were made available at Central Bradford, Shipley, Bingley and Ilkley libraries;
 - were available to download on the Council's website;
 - were posted to fifty-five statutory consultees and a further 250 individuals/bodies were notified of the consultation period.
5. The consultation period was advertised in Bradford's local newspaper – Telegraph and Argus on 2 April 2007 (see attached Legal Notice); and a consultation event was held at Victoria Hall in Saltaire to give local developers a chance to give comments on the document.
6. The statutory consultees are listed below:

Addingham Parish Council Borough of Pendle Council Bradleys Both Parish Council British Telecom Burley in Wharfedale Parish Council Calderdale Metropolitan Borough Council City of Wakefield M D C Clayton Parish Council Cononley Parish Council Cowling Parish Council Craven District Council Cullingworth Parish Council Denholme Town Council Denton Parish Council Draughton Parish Council Drighlington Parish Council English Heritage Environment Agency Farnhill Parish Council Gildersome Parish Council Glusburn Parish Council Government Office for Yorkshire & Humber Harrogate District Council Haworth, Cross Roads & Stanbury Parish Council Highways Agency Ilkley Parish Council Keighley Town Council	Kirklees Metropolitan Council Lancashire County Council Laneshaw Bridge Parish Council Leeds City Council Menston Parish Council Middleton Parish Council Natural England x2 Nesfield with Langbar Parish Council Network Rail North Yorkshire County Council Otley Town Council Oxenhope Parish Council Pendle Sandy Lane Parish Council Silsden Town Council Steeton with Eastburn Parish Council Sutton-in-Craven Parish Council Telewest Communications Transco (North of England) Trawden Forest Parish Council Wadsworth Parish Council Weston Parish Council Wilsden Parish Council Wrose Parish Council Yorkshire and Humber Assembly Yorkshire Electricity Yorkshire Forward Yorkshire Water Services Ltd
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7. A full list of all the other consultees can be found below.

Councillors & MP's

A A Planning Services	Indigo Planning
A Khawaja Architectural Services Limited	Inland Waterways Association
Accent Group Ltd	J C Redmile
Aireborough Planning Services	J O Steel Consulting
Aldersgate Estates Ltd	J R Wharton Architect
Al-Farouq Associates	Kelly Architectural Design
Allison And MacRae	KeyLand Developments
Ancient Monuments Society	Land & Development Practice
Asquith Properties	Landmark Development Projects (2000) Ltd
Baildon Community Link	Landtask
Banks Long & Co	Langtree
Barton Willmore Planning Partnership	Leith Planning Ltd
Beckwith Design Associates	Littman Robeson
Ben Bailey Homes	Manningham Housing Association
Ben Rhydding Action Group/Save Us Pub	Manor Property Group
Bioregional Quintain Developments	Maple Properties
Blue Room Properties	Marilyn Brichard
Bob Jarman	Mark Brearley & Co Chartered Surveyors
Bradford & District Chamber of Trade	McGinnis Development
Bradford Cathedral	Newmason Properties
Bradford Centre Regeneration	North Country Homes Group Ltd
Bradford Chamber of Commerce	Npower Renewables
Bradford Civic Society	Nuttall Yarwood And Partners
Bradford Community Housing Trust	Oltergraft Planning Services
Bradford Vision	Omega Design
Brewster Bye Architects	Outdoor Advertising Consultants
British Wind Energy Association	P M Coote
Bryant (Taylor Woodrow)	Parkgate Design
Burnett Planning & Development	Parkgate Design
Caddick Development	Paul & Co
Calder Architectural Services Limited	Peacock and Smith
Campaign For Real Ale	Penny Trepka
Carter Jonas	Persimmon Homes (West Yorkshire)
CB Richard Ellis Ltd	Piccadilly Estate Management Ltd
Chris Thomas Ltd	Planet Design Group
City Lofts Development	Planning Advisor
Clear Designs	Planning Inspectorate
Council for British Archaeology	Planning Potential
Countryside Properties (Northern) Ltd	Planning Prospects Ltd
Craven Design Partnership	Plot of Gold Ltd
Crosby Lend Lease (Yorkshire) Ltd	PPG Land Ltd
Dacre Son And Hartley	Priority Sites Ltd
David Beighton Architects	Regen 2000
David Wilson Estates	Robinson Group
Depol Associates	Royal Town Planning Institute
DevPlan UK	RPS
Dialogue Communicating Planning	Sanderson & Weatherall
DLA Architecture	Simon Estates Ltd
Donaldsons LLP	Skipton Properties
DPDS Consulting Group	Society for the Protection of Ancient Buildings
Drawtech	Spawforth Planning Associates
DTZ Pieda Consulting	St Aidan's Presbytery, Baildon
Eddisons Commercial	St James Securities Ltd
Eric Barraclough	Star Keys Estate Agents, Valuers & Surveyors
Eric Breare Design Associates	SWG Planning Services

F And W Drawing Services
 Farrell and Clark
 Four Square Drawing Services
 G R Morris Town Planning Consultant
 Garbe Real Estate Ltd
 George Wimpey Northern Yorkshire Ltd
 Gleave House
 Goitside Regeneration Partnership
 Goldfinch Estates Ltd
 GP Planning And Building Services
 Gregory Properties
 Group Asset and Development Team
 GVA Grimley
 Halliday Clark
 Ham Group
 Haslam Homes
 Hayes Dobson Developers Limited
 HJ Banks and Co Ltd
 Home Builders Federation
 Housing Corporation
 Housing Corporation, NE Region
 How Planning

The Abbeyfield Society
 The City Centre Project
 The Garden History Society
 The Georgian Group
 The Mall Corporation
 The Moravian Manse, Baildon
 The Theatres Trust
 The Twentieth Century Society
 The Vicarage, Baildon
 The Victorian Society
 Trident
 Turner Associates
 Turner Developments
 Urban Splash
 Vincent and Goring Ltd
 VJ Associates
 Walton & Co
 Webb Seeger Moorhouse Partnership Ltd
 West Yorkshire Passenger Transport Executive
 Westfield Shoppingtown Ltd
 Woodhall Planning & Conservation
 Working Architects Co-Op Limited
 Yorkshire Planning Aid

8. A total of sixty one representations were submitted to the Council from 9 consultees, including a number of comments from the Bradford Property Forum which were received and accepted after the end of the consultation period. The representations are set out in **Appendix 1** along with the Council's response and proposed changes, if appropriate. A number of other changes have also been made for clarity and also as a consequence of other changes.
9. The comments and issues raised widely differing and conflicting views on the SPD with some respondents feeling it inappropriate to include requirements for affordable housing and to set what were felt to be prescriptive policies relating to minimum space standards and other matters. Other respondents however supported the same such policies feeling that they will ensure that the accommodation built will meet the needs of future occupants. Another theme which emerged from the comments was a suggestion that the SPD should be scrapped pending the production of the new LDF and the emergence of more up to date evidence on the housing market. The document has been amended to reflect the comments, to reflect national planning policy and improve its clarity and effectiveness. Appendix 1, as well as indicating the Council's response to the comments also indicates which sections of the SPD have been changed.

CITY OF BRADFORD METROPOLITAN DISTRICT COUNCIL
PLANNING AND COMPULSORY PURCHASE ACT 2004
THE TOWN AND COUNTRY PLANNING (LOCAL DEVELOPMENT) (ENGLAND)
REGULATIONS 2004

**NOTICE OF DEPOSIT OF DRAFT SUPPLEMENTARY PLANNING DOCUMENT FOR
PUBLIC COMMENT
CITY CENTRE AFFORDABLE HOUSING**

LOCAL DEVELOPMENT FRAMEWORK FOR THE BRADFORD DISTRICT

The City of Bradford Metropolitan District Council has published a draft Supplementary Planning Document called *City Centre Affordable Housing* for public comment. The draft Supplementary Planning Document sets out the approach that will be taken by the Council with regard to the implementation of its affordable housing policy in Bradford City Centre.

Copies of the Draft Supplementary Planning Document are available for inspection at the Council's Planning Offices at:

- Jacobs Well, Manchester Road, Bradford BD1 5RW (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Keighley Information Centre, Town Hall, Bow Street, Keighley BD21 3PA (Mon-Thurs 8.30am to 5pm, Fri 8.30am to 4.30pm)
- Shipley Town Hall, Kirkgate, Shipley BD18 3EJ (Mon-Thurs 9am to 5pm, Fri 9am to 4.30pm)
- Ilkley Town Hall, Station Road, Ilkley (Mon-Thurs 9am to 5.00pm, Fri 9am to 4.30pm)

And at the following libraries:

- Bradford Central Library, Princes Way, Bradford BD1 1NN (Mon-Fri 9am to 7.30pm, Sat 9am to 5pm)
- Shipley Library, 2 Wellcroft, Shipley BD18 3QH (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Bingley Library, Myrtle Walk, Bingley BD16 1AW (Mon-Fri 9am to 7pm, Sat 9am to 5pm)
- Ilkley Library, Station Road, Ilkley LS29 8HA (Mon-Fri 9am to 7pm, Sat 9am to 5pm)

And on the Council's web site at www.bradford.gov.uk/planning

Also available for inspection are the Council's Sustainability Appraisal Report, Consultation Statement and Statement of Matters.

Any person may make representations about the Supplementary Planning Document. Representations must be made in writing and submitted by either email to ldf.consultation@bradford.gov.uk, or by letter to Local Development Framework Group, Plans and Performance Service, 8th Floor, Jacobs Well, BRADFORD, BD1 5RW. The closing date for comments is 14 May 2007. Comments should be headed 'City Centre Affordable Housing Supplementary Planning Document'. Any representations may be accompanied by a request to be notified at a specified address of the adoption of the Supplementary Planning Document.

Dated this 2nd day of April 2007

Gerry A Danby, Barrister
Legal and Democratic Services Director
City of Bradford Metropolitan District Council
City Hall
Bradford BD1 1HY

APPENDIX 1

SUMMARY OF REPRESENTATIONS TO DRAFT CITY CENTRE AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT

(Name / Organisation)	Representation(s) to Draft City Centre Affordable Housing SPD	Bradford MDC Response	Outcome
1.0 DTZ Piedad	1.1 The document should be amended to reflect PPS3 in particular bringing down the threshold to 15.	The Council agrees with the reduction of the lower site threshold to 15 units in line with paragraph 29 of PPS3 which was published by the Government after the drafting of the SPD.	Amend the SPD to reflect PPS3 advice on site thresholds.
	1.2 Need to more accurately reflect where there is a zero % requirement as the map in the document is a bit broad brush.	The Council agrees with this suggestion. The SPD would be clearer for developers if the student campus area was identified on the map in Appendix 2 and similarly if the existing areas of social housing mentioned in paragraph 3.1 were also more clearly marked.	Amend the map in Appendix 2.
	1.3 Is there a clear indication of when the City Centre AAP will be completed and for how long the SPD will be interim?	The Revised Local Development Scheme, adopted by the Council in December 2007, sets out the programme for the LDF including the Bradford City Centre AAP. The AAP underwent Issues and Options stage consultation in Autumn 2007 and is scheduled for adoption by early 2011. This DPD provides the opportunity to review and update within the statutory development plan, the affordable housing policies for the City Centre. If circumstances require it, It remains an option to review and update this SPD at any point before the AAP is adopted.	Amend the Executive Summary and paragraph 2.1 of the SPD to provide detail of the programme for completion of the Bradford City Centre AAP.
2.0	2.1 We are broadly supportive of the document which is	The supporting comment is noted.	No change.

Yorkshire Forward		in general well aligned to the RES.		
	2.2	We generally support the guidance in 3.5 and 3.7 which advise developers that affordable housing should be well integrated and built to a high quality standard.	The supporting comment is noted.	No change.
	2.3	The Agency welcomes the use of the DTZ Balanced Housing Market Study, but it may be necessary to be mindful of the continuing house prices increases since its completion.	The Council agrees with the comment. The affordable housing policy will be reviewed in the LDF to reflect changes in house prices.	No change.
	2.4	We generally support the Council's commitment to increasing the housing mix within the city centre, specifically through increasing LCHO properties.	The supporting comment is noted.	No change.
3.0 Dacre, Son & Hartley Planning Unit	3.1	We are not opposed to the concept of a specific affordable housing requirement; we consider the promotion of this document at this time to be both premature and without evidence.	The SPD is supplementing the affordable housing policy contained within the adopted UDP. The UDP itself establishes the need for affordable housing contributions for development schemes within Bradford City Centre. The respondent does not say why the SPD is premature. The City Centre has a quickly growing housing market and there is a clear need for affordable housing within it – it would therefore be inappropriate for the Council to Council to delay the SPD. Moreover the SPD is based on and a follow up to the in depth balanced housing market study of the city centre carried out by DTZ. It is therefore in the Council's view based on robust and up to date evidence.	No change.
	3.2	We fail to see how the Council can produce a detailed percentage requirement without providing a more detailed trajectory on City Centre delivery and its role	The need for affordable housing within the city centre and the percentage requirement for this and other inner urban areas of Bradford, including how	No change.

		in the wider delivery of market and affordable housing across the District.	those percentages were derived, has already been debated and established through the production of the UDP which was adopted in October 2005. The inquiry and its presiding inspector did not have any problems with the method by which percentage requirements were derived at that time. There is no national or regional guidance to suggest that percentage targets for affordable housing must be determined via the production of 'delivery trajectories'. The correct way, in the Council's view, to determine percentage targets is through an up to date analysis of housing need and demand, of affordability and of the state of the housing market, which was carried out within DTZ's balanced housing market study for the city centre. In addition to the above points the Council also suggests that the production of trajectory related analyses would not, ahead of the production of an Area Action Plan, be an a useful, accurate or practical means of analysis since the majority of development currently emerging in the centre is through windfall development rather than development plan allocations.	
	3.3	Without any understanding of the quantum of development in the District, the percentages for the City Centre are meaningless and are totally unrelated to the wider needs of the District.	The Council disagrees with this view for the reasons set out in the paragraph above. In addition the Council suggests that the main factors in determining the city centre affordable housing policy is not the quantum amount of development in the whole of the district which contains many different housing markets with different characteristics to that of the city centre, but an up to date analysis of the developing city centre market, the likely level of need and demand for affordable housing within the centre and the need to sustain regeneration and create balanced and sustainable	No change.

			communities. All of these factors were assessed in the DTZ balanced housing market study which informed the SPD.	
	3.4	We suggest that the production of the SPD is delayed until after the Core Strategy DPD has been adopted.	There is a need for affordable housing in the city centre now. Moreover as the housing market in the city centre is still in its early stages of development, there is a pressing need for an SPD which will ensure that affordable housing needs are met, that a balanced and sustainable community emerges and that developers, applicants, and planning officers have a clear and appropriate policy framework to deliver these goals. Achieving these goals and delivering the necessary affordable housing would be severely undermined if the production of an SPD was delayed until after the Council's Core Strategy was adopted as this is not scheduled to occur until late 2010. This could lead to a potentially massive backlog of unmet need. Finally the Council would again point out that the SPD is a supplement to the existing RUDP and Policy H9 within it, not the emerging LDF Core Strategy.	No change.
	3.5	We suggest the Council produces a transparent Housing Market Assessment which contains an up to date housing needs assessment and aspirations survey on type, size and location.	The Council has now finished the production of a detailed Local Housing Assessment while consultants Ecotec are finalising a Strategic Housing Market Assessment for the Yorkshire and Humber Regional Assembly. There is nothing in the analysis in these documents which is contradictory to the policies and goals of the SPD. Officers working on the Local Housing Assessment document have been fully involved with the DTZ balanced housing market study project and the production of the SPD.	No change.

	3.5	We suggest the Council produces the city centre affordable housing requirements as part of a District wide affordable housing SPD that considers build rates, housing need and affordability in all the distinct market areas of the District.	The city centre affordable housing requirements have already been produced as part of a district wide housing analysis - in the UDP itself, and the SPD is merely developing and refining this approach. The Council is committed to augmenting the approach for the rest of the district via a new SPD based on the UDP and the recently published district wide Local Housing Assessment. Affordable housing policies as a whole will be reassessed as part of the emerging LDF, in particular the Core Strategy, City Centre AAP and Housing, Employment and Safeguarded Land Development Plan Documents all of which are in the Council's LDS work programme. In the Council's view this approach offers the best means of delivering the affordable housing needed now while offering opportunities to address and develop policy flexibly in the coming years as the housing market across the district changes.	No change.
Home Builders Federation (HBF)	4.1	The HBF believe that the proposals at this stage are premature. The proposed SPD is not supported by an overarching Strategic Housing Assessment and therefore, it is not founded on a robust evidence base.	The Council does not consider the SPD to be premature, as the DTZ Balanced Housing Market Study provides an up to date and robust basis for its production. Moreover the city centre market is growing quickly and there is a need for affordable housing now as concluded in the DTZ report. The SPD itself is supplementing established policy within the adopted UDP. The Regional Assembly has commissioned work to produce a Strategic Housing Market Study and this together with the Council's own Local Housing Assessment will inform the production of Bradford's LDF documents. There is nothing in the analysis of these documents which is contradictory to the policies and goals of the SPD. In conclusion the SPD is supporting the delivery of affordable housing which	No change.

			is needed now and is supplementing the adopted UDP. The Council considers it is founded upon an up to date and robust evidence base.	
	4.2	The HBF would contend that the inclusion of Circular 6/98 and PPG3 in the list of relevant publications is unsound as they have been superseded by PPS3. The HBF emphasises the need to base policies on a robust and up to date policy base.	The Council agrees that the sections of the SPD relating to the circular, PPG3 and draft PPS3 need updating in the light of the publication of PPS3. However the Council considers that the SPD as drafted, with just a few exceptions such as site size thresholds which will be addressed in amendments, accords with the PPS, its policies and affordable housing goals. Moreover it should be pointed out that the main policy base for the SPD is the adopted UDP.	Amend Paragraphs 2.2, 2.3, 2.4 and 8.1 to reflect the Government's newly issued PPS3.
	4.3	The HBF questions the inclusion of the Draft RSS (2005) as this is out of date and we are now awaiting the publication of the Proposed Changes document after the Panel Report and recommendations was published on 4 May 2007.	The Council agrees that the SPD should be amended to incorporate the content of the RSS as issued by the Secretary of State in May. The Council considers that the SPD accords with the new RSS and its goals to increase the delivery of affordable housing.	Paragraph 2.6 to be amended to reflect the recently adopted RSS.
	4.4	It is important that affordable housing policies are underpinned by a Housing Market Assessment undertaken in consultation with the development industry.	The SPD is based on an analysis of the emerging City Centre housing market in the DTZ study which in the Council's view is still relevant research. Moreover the Regional Assembly has commissioned a Strategic Housing Market Assessment and the Council has recently completed its Local Housing Assessment There is nothing in these more recent documents which is contradictory to the policies and goals of the SPD.	No change.
	4.5	The HBF objects to the exception that affordable housing should be provided through pepper potting as this has proven unworkable in practice.	The Council disagrees with this comment and considers it to be fundamentally at odds with the Government's principle of creating mixed and balanced communities. No evidence or information	No change.

			is provided by the respondent to back up the assertion that the use of pepper potting is unworkable and such an approach is present in many other Council's SPD's. Moreover there is a good deal of flexibility in the SPD in that it does not seek to prescribe the form of pepper potting nor does it say that pepper potting will be sought or possible on all occasions. The Council also notes that the view of the HBF on pepper potting is not one which is supported by Yorkshire Forward or BCHT.	
	4.6	The HBF is opposed to Para 3.5 which requires the submission of a viability analysis and solutions to enable pepper-potting, as it considers this to be too onerous on developers.	The HBF have misread this paragraph – the paragraph does not say that a financial viability analysis should be submitted to the Council with all applications, merely that developers will need to build the potential use of pepper potting into their own site viability appraisals when assessing sites and preparing schemes. Submission of a viability analysis is only an issue where the developer / applicant is seeking to waive or reduce affordable housing contributions.	No change.
	4.7	The HBF disagrees with the setting of space standards for affordable housing, as it believes that this is too prescriptive and inflexible, and does not take into account the differing characteristics of sites. The HBF does not consider it necessary for the SPD to set out any additional quality standards. Changes to standards/requirements in construction need to be made with detailed consideration so that the cost of achieving the requirement does not outweigh the benefit obtained by the change.	<p>The Council considers that the inclusion of space standards within the SPD is vital as it will help to ensure that the homes built are not only affordable but are fit for purpose in meeting the accommodation needs of its occupiers. The standards specified are derived from Housing Corporation guidance which Housing Associations are expected to build to in order to qualify for finance and are supported by the Government.</p> <p>The Council notes that the inclusion of space standards is consistent with the planning policies</p>	Make a minor change to the text of paragraph 3.7.

			<p>and best practice among other planning authorities in the region and that the approach of the SPD has been supported by BCHA and by Yorkshire Forward.</p> <p>However on the other hand the Council appreciates the need to negotiate each planning application on its merits and that there may be occasions where lower space standards would meet the need of occupiers in an acceptable way. Thus the wording of paragraph 3.7 is to seek such standards rather than require them. However a further minor change to the text of would clarify the flexible nature of the approach.</p>	
	4.8	<p>The HBF considers that the differing targets are dependent on thresholds, however, it emphasises the importance of the viability of development sites which is a key theme of PPS3. Affordable housing requirements should not compromise this, as it will prevent sites coming forward. Just as important are tenure and delivery issues.</p>	<p>Affordable housing requirements should be factored into any purchase by developers of land and property. In addition, the thresholds and targets are less onerous than if Policy H9 is applied in isolation. In line with Policy H9, economics of provision can be taken into account where the applicant can demonstrate that the development is not financially viable. In such circumstances the level and form of affordable housing requirement is a legitimate matter for negotiation. This could however be made clearer in the text of the SPD.</p>	<p>Amend the Executive Summary and paragraph 8.1 to make it clear in the SPD that the economics of provision i.e. site viability, can still be taken into account in negotiating affordable housing contributions in line with Policy H9 of the adopted UDP.</p>
	4.9	<p>Overall the HBF does not consider it appropriate to delegate matters such as the amount, type and size of affordable housing to a SPD. Any matters of importance should be in a DPD, and be subjected to the appropriate public scrutiny bestowed upon these.</p>	<p>The SPD does not change the central tenet of Policy H9. Moreover the UDP set out matters such as the amount of affordable housing required in the supporting text rather than in Policy precisely because such matters need to be kept under regular review as the market and housing needs</p>	<p>No change.</p>

			change rapidly. Restricting matters such as the amount, type and size to a DPD would not allow the Council to respond quickly enough to change and to deliver the Government's affordable housing goals. The SPD policy vehicle is felt to be an appropriate place to set out such requirements and has such an approach has been replicated in many other Council's SPD's.	
5.0 Jones Lang LaSalle (on behalf of Keyland Developments Ltd)	5.1	We are concerned with the introduction of inflexible affordable housing targets on almost all sites within the City Centre.	The Replacement UDP has been through the Public Inquiry process to produce an appropriate policy. The SPD is actually more flexible in approach, as there are different requirements for different site sizes and the full UDP specified 15% requirement does not take affect for smaller schemes. In line with Policy H9, economics of provision can be taken into account where the applicant can demonstrate that the development is not financially viable. In such circumstances the level and form of affordable housing requirement is a legitimate matter for negotiation. This could however be made clearer in the text of the SPD.	Amend the Executive Summary and paragraph 8.1 to make it clear in the SPD that the economics of provision i.e. site viability, can still be taken into account in negotiating affordable housing contributions in line with Policy H9 of the adopted UDP.
	5.2	We feel that the loss of flexibility established in Policy H9 in the RUDP and the application of the targets set out in the draft SPD will challenge your aspirations for regeneration of the City Centre.	The SPD does not alter the negotiation approach set out in the UDP, and it is more flexible on site size than Policy H9. This could however be made clearer in the text of the SPD.	<u>Amend the SPD Executive Summary and paragraph 8.1 to reinforce the Council's willingness to negotiate the scale and form of affordable housing provision.</u>
	5.3	These targets are set by scheme size rather than by any other consideration and the wording as proposed	The baseline target of 15% was discussed, justified and endorsed through the UDP and the SPD's	No change.

		do not allow sufficient flexibility in their application.	approach is likewise supported by the wide-ranging analysis carried out by DTZ. The use of site size thresholds allows additional flexibility in recognition that larger sites can absorb the costs of affordable housing provision across the site.	
	5.4	We suggest that due to the lack of a buoyant residential market in the City Centre, the imposition of targets and space standards will discourage investors due to the viability of the scheme.	The comment made is merely speculation and is not supported by any specific data or evidence. The Council has been operating an affordable housing requirement for some time and the SPD is not making fundamental changes to the policy already embodied within the UDP. Should evidence emerge that development activity is being discouraged by the City Centre Affordable Housing Policies then those policies can be reviewed and changed and indeed there is an opportunity to review policy in the forthcoming Bradford City Centre AAP. Moreover Policy H9 of the UDP allows the economics of provision to be taken into account in negotiating the scale and form of affordable housing contribution and this will be made clear in the SPD by the amendments discussed above.	Amend the Executive Summary and paragraph 8.1 to make it clear in the SPD that the economics of provision i.e. site viability, can still be taken into account in negotiating affordable housing contributions in line with Policy H9 of the adopted UDP
	5.5	Planning policy needs to be put in place to stimulate and encourage the establishment of a residential market in the City Centre, whilst managing public and private interests, rather than placing additional obstacles and inflexible policies.	The SPD's policy is not inflexible and in some areas reduces the requirements already in place in the UDP. The Council is pursuing extensive regeneration policies to stimulate a residential population which is increasing all the time. The SPD is not seen as an obstacle, but as a vehicle for meeting the housing needs of the District's population.	No change.
	5.6	Affordable housing provision needs to be balanced with other regeneration objectives and the principles of sustainable development. Creating a new residential community within the City Centre must be	The SPD is based on a full and wide ranging study of the City Centre by DTZ and the assessment of current and evolving housing need took account of a range of factors including the environment,	No change.

		supported by an efficient public transport system, access to a range of jobs and shops, supported by a good social infrastructure.	services and infrastructure of the city centre. The forthcoming Bradford City Centre AAP will revisit and assess all the issues mentioned by the respondent.	
	5.7	We support the Council's aspirations to create a balanced housing market and the need to deliver a range of property types. However, to attract a new and mixed profile of residents, social infrastructure needs to be in place; however we note that Bradford is in a somewhat "chicken and egg" situation in terms of delivering such facilities without an evidenced need.	The Council notes the comments made but does not consider that they require any changes to the SPD.	No change.
	5.8	The provision of a balanced range of tenures and types will have an impact on density and design. All residents, but families in particular will aspire to having some sort of outside private space. Recently developed schemes in city centres lack such facilities, and in providing a range of unit sizes and tenures, prior to the establishment of a buoyant residential market, then compromises will need to be made in other areas.	It is not clear what the respondent is saying about the SPD or whether or what changes they are suggesting need to be made. Clearly the design of all schemes result from a combination of issues relating to tenure, density, size, and facilities. Private open space may be incorporated within some city centre schemes – and the SPD does nothing to prevent this. However in most cases it is expected that open space will be provided in publicly shared amenity areas within the city centre rather than within each plot.	No change.
	5.9	We suggest it is imperative that city centre living become established before the Council seeks affordable housing at the proposed target levels. Bradford needs an established community to stimulate social infrastructure provision with a broader mix of residential tenures provided in the later phases of regeneration. The barriers identified by DTZ must be overcome first.	The Council disagrees with this comment. The UDP has established the need for and the legitimacy of making provision for affordable housing in the City Centre. The balanced housing market study carried out by DTZ has taken account of the relatively early stage of development of city centre living in making its policy suggestions. The need for a broader mix of residential tenures is acknowledged in the SPD and in its stated preference for low cost ownership models rather than for additional social rented housing.	No change.

	5.10	We suggest that either the affordable housing requirement is delayed for a period of three years until the City Centre AAP is adopted, or that a more flexible wording is used, similar to Policy H9 in the RUDP to enable greater negotiation for the delivery of difficult sites.	The Council cannot delay the SPD as there is an established need for affordable housing now. In line with Policy H9, economics of provision can be taken into account where the applicant can demonstrate that the development is not financially viable. In such circumstances the level and form of affordable housing requirement is a legitimate matter for negotiation. This could however be made clearer in the text of the SPD.	Amend the Executive Summary and paragraph 8.1 to make it clear in the SPD that the economics of provision i.e. site viability, can still be taken into account in negotiating affordable housing contributions in line with Policy H9 of the adopted UDP.
	5.11	Whilst we recognise that Bradford is aspiring high and seeking transformational change of the centre, these aspirations must be set within the market context; the delay of Broadway Shopping Centre being a key indicator that the market needs further stimulation, which will provide a recipient community and support wider regeneration objectives so that affordable and family accommodation can be successfully delivered.	The whole point of the DTZ balanced housing market study was to assess the state of the market and level of housing need in the city centre within the context of the ongoing need to implement regeneration schemes and stimulate further regeneration in the area. The study has concluded that there is a need for the planning process to bring forward affordable housing in the city centre and suggested the thresholds and targets which are most appropriate in the light of all the factors which the respondent mentions.	No change.
6.0 Spawforths (representing the Langtree Plc, Artisan and Carey Jones Architects Venture – New Victoria Place)	6.1	We object to the SPD on the grounds that we do not consider the document demonstrates a proven need or rationale for the increase in provision based on the scheme size (i.e. 15% provision for schemes over 50 units) and does not interpret the DTZ Balanced Housing Market Study in sufficient detail to demonstrate this proven need.	The figure of 15% provision is already established in the RUDP which has been subject to scrutiny and endorsement through the statutory planning process. Rather than putting forward an increase in affordable housing required the SPD actually reduces the requirement for smaller sites. The SPD takes into account that larger sites are often more able to economically absorb a larger provision of affordable housing. The draft SPD has been produced by DTZ – the authors of the Balanced	No change.

			Housing Market Study – and has thus been adequately interpreted.	
	6.2	We would also expect the SPD to interpret and elaborate on Policy H9 of the RUDP, confirming the economics of provision and any exceptions to this rule in which a reduction in affordable housing provision may be considered.	The Council agrees that the SPD should be amended to make clear that the principle of negotiating the form and scale of the affordable housing requirement, as set out in Policy H9 of the UDP, still applies and that the economics of provision can be taken into account.	Amend the Executive Summary and paragraph 8.1 to make it clear in the SPD that the economics of provision i.e. site viability, can still be taken into account in negotiating affordable housing contributions in line with Policy H9 of the adopted UDP.
	6.3	In reference to Para 3.7, we consider the use of space standards within this SPD is too prescriptive and should be something which is assessed and evaluated separately as part of individual development proposals on its merits.	<p>The Council considers that the inclusion of space standards within the SPD is vital as it will help to ensure that the homes built are not only affordable but are fit for purpose in meeting the accommodation needs of its occupiers. The standards specified are derived from Housing Corporation guidance which Housing Associations are expected to build to in order to qualify for finance and are supported by the Government.</p> <p>However on the other hand the Council appreciates the need to negotiate each planning application on its merits and that there may be occasions where lower space standards would meet the need of occupiers in an acceptable way. Thus the wording of paragraph 3.7 is to seek such standards rather than require them. However a further minor change to the text of would clarify the flexible nature of the approach.</p>	Make a minor change to the text of paragraph 3.7

7.0 Bradford District Chamber of Trade	7.1	We would like to express caution about the wholesale change of industrial premises in the city centre into residential developments. We need to ensure if there is a turnaround in the fortunes of small independent start up businesses, there will always be properties available for them to “start-up” in.	The Council appreciates the comments made but it is national policy to utilise employment land and buildings which are no longer required for such uses and which cannot be brought into an alternative economic use. The SPD does not itself encourage the conversion of industrial premises and it is in any case beyond the scope of the SPD to address this issue. Achieving the correct balance of uses will however be a key issue within the forthcoming Bradford City Centre AAP.	No change.
8.0 Bradford Community Housing Trust	8.1	The threshold for provision of 0% affordable housing should be reduced from 25 to 15 units in line with the regional strategy.	The Council agrees with this comment.	The executive summary and paragraph 8.1 will be amended along the lines suggested by the respondent.
	8.2	Why is there a sliding scale from 10% to 15%? We believe the level of affordable units sought should be set at 15% across the board in the city centre.	The scale is set so as to not hinder development on economically marginal sites; larger sites can often better absorb planning obligation costs. The thresholds results from a thorough analysis by DTZ of both housing need and the state of the market within the city centre.	No change.
	8.3	We are flexible about on or off site provision as long as the money is ring-fenced to housing.	The comments are noted. The SPD needs to make clearer in paragraph 8.1 when it will seek commuted sums rather than on site provision and how it will determine the scale of such sums. This will give more certainty to developers in drawing up their schemes and assessing site viability.	Amend paragraph 8.1 to explain the Council’s approach to commuted sums and off site provision.
	8.4	BCHT is reviewing its Chain Street development. Provision of affordable rented units on Chain Street will drop as the proposed scheme focuses on mixed tenure. BCHT intends to introduce LCHO and market sales to Chain Street. However trying to achieve this may be hampered by BCHT / Council claw back	The comments are noted, however the respondent does not appear to highlight any required changes to the SPD.	No change.

		agreement.		
	8.5	Tenure blindness and pepper potting is supported by BCHT.	This comment is noted and welcomed.	No change.
	8.6	We agree the majority of new development is likely to be flats but believe there is a role for houses in the city that would be in demand in the affordable sector. BCHT proposals for Chain Street include both flats and houses.	The Council notes and agrees with the comment.	No change.
	8.7	We agree affordable sector needs a mixed portfolio of property sizes to match predicted demand and population profile	This supporting comment is noted and welcomed.	No change.
	8.8	We agree that quality standard is important and minimums should be set.	This supporting comment is noted and welcomed.	No change.
	8.9	The profile of affordable rented units in the city will change due to the impact of BCHT development plans and the RTB.	Any such change to the state of the housing market will be taken into account in the development of future policies.	No change.
	8.10	We agree a need for a full staircase of housing opportunity with LCHO having an important role however the need for rented affordable housing remains and has an important function in providing housing opportunity.	<p>The Council agrees that there will be a continued need for rented affordable housing in the city centre. However whilst the imbalance of tenure in terms of current supply is addressed, the Council wishes to encourage increased levels of low cost home ownership. Increased home ownership in the centre will also serve to increase incomes and patronage of shops, and cultural and entertainment facilities in the centre.</p> <p>This should not however rule out a limited number of schemes for rental where this is justified by an identified and unmet need and this flexibility should be introduced into the wording of the SPD.</p>	Amend section 4 of the SPD to emphasise that while LCHO schemes will be preferred by the Council in the short term, a limited number of schemes for social rent may be considered where there is an identified and unmet need.

	8.11	Our view is that Shared Ownership is preferable to shared equity. Via staircasing it gives purchasers a clear route to full ownership and the full benefit of ownership without restriction. Staircasing revenues become available for reinvestment.	The SPD at present outlines a number of different Low Cost Home Ownership models. Section 4 needs amending as it implies that the Council prefers shared equity / ownership models over discount for sale which is not the case. The Council is happy to negotiate shared ownership schemes in the right circumstances and the wording of the SPD as proposed in these amendments will not prevent this.	Amend section 4 of the SPD to remove the indication that the Council will prefer shared ownership and shared equity schemes over discount for sale and to clarify that all forms will be used as appropriate to the scheme, location and developer.
	8.12	Social renters may convert to owners through RTA and RTB and this in the past has also provided an important option for people moving tenure type.	The comments are noted.	No change.
	8.13	If it is acknowledged and predicted that there is going to be an imbalance in affordable rented stock and demand why wait? Why not have some affordable rented units now to deal with predicted shortfall early? We believe there is demand in the city centre for affordable rented units.	Please see the response in relation to 8.10 above which also applies here.	Amend section 4 of the SPD to emphasise that while LCHO schemes will be preferred by the Council in the short term, a limited number of schemes for social rent may be considered where there is an identified and unmet need.
	8.14	We agree there is a demand for some larger rented units.	Comment noted and agreed.	No change.
	8.15	RSL participation in allocation of units is limited and it is Council driven. Would it be possible to develop a more participative system with RSL involvement earlier in the process	These comments are noted and will be considered by the Housing Service but are not related to issues within the scope of the SPD.	No change.
9.0	9.1	Is the evidence on which the SPD is based up to	The Council considers that the SPD is based on	Amend section 4 of the

<p>Bradford Property Forum</p>		<p>date? The situation in Bradford City Centre is evolving quickly and it is apparent that there is no longer an oversupply of social housing in the city centre (as the SPD states).</p> <p>The amount of social housing in the city centre does not currently meet demand which has changed significantly since the DTZ city centre study. The supply will be further eroded by the demolition of a substantial part of Bradford Community Housing Trust's (BCHT) stock situated at Chain Street within the Goitside regeneration area. The remaining stock at this location has been modernised and remodelled but this has also resulted in a reduction in the number of units.</p> <p>Whilst BCHT's replacement new build will go some way to providing an increased range of housing types there will nevertheless continue to be an imbalance within the City Centre area.</p> <p>In our opinion the Section 106 process continues to perpetuate this inappropriate mix of mainly one and two bedroomed apartments.</p>	<p>sound and up to date evidence. The full and detailed appraisal carried out by DTZ in its balanced housing market study looked at both the need and supply side of housing in the city centre and looked to produce a suite of SPD policies that reflected the point reached in the regeneration process. Emerging evidence in the form of the Council's Local Housing Assessment contains nothing to suggest the fundamentals of this SPD are incorrect.</p> <p>The Council notes that the supply of housing is evolving through both the process of new build and the redevelopment schemes such as at Chain Street. The SPD is only an interim policy document pending the completion of the Bradford City Centre AAP. This LDF document will, unlike the SPD, have the scope to look at the full range of city centre issues, take account of how supply is changing in the city centre as regeneration initiatives such as those being progressed by BCR, the Council and BCHT are implemented.</p> <p>The Council agrees that there will be a continued need for rented affordable housing in the city centre. However whilst the imbalance of tenure in terms of current supply is addressed, the Council wishes to encourage increased levels of low cost home ownership. Increased home ownership in the centre will also serve to increase incomes and patronage of shops, and cultural and entertainment facilities in the centre.</p> <p>This should not however rule out a limited number of schemes for rental where this is justified by an identified and unmet need and this flexibility should</p>	<p>SPD to emphasise that while LCHO schemes will be preferred by the Council in the short term, a limited number of schemes for social rent may be considered where there is an identified and unmet need.</p>
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			<p>be introduced into the wording of the SPD.</p> <p>The SPD does in no way restrict the size and type of housing provided and it is up to developers to come forward with schemes which reflect need and provide a better balance between apartments and family homes.</p>	
	9.2	<p>'Pepper-potting' (paragraph 3.4 and 3.5) is no longer a commonly used term. 'Mixed tenure' is a more preferable term.</p>	<p>Pepper potting and mixed tenure are completely different concepts. The latter does not relate to the location of affordable housing units within a scheme's layout. Pepper potting is a concept which is in line with the Government's principle of mixed and balanced communities. Schemes that segregate and differentiate between market and non market housing do nothing to encourage such principles. The Council notes that the principle of pepper potting is supported by both BCR and Yorkshire Forward in their responses to this SPD.</p>	No change.
	9.3	<p>Achieving regeneration is a long term issue and therefore requires a long term view.</p>		
	9.4	<p>The SPD states that CBMBC have a preference for the delivery of shared equity and shared ownership properties over discounted units for sale (paragraph 4.3).</p> <p>It is important to note that there is a difference between shared ownership and shared equity. The SPD appears to put them on a level playing field. We do not consider that this is appropriate. Each has their own specific characteristics and we would suggest that residents within the City Centre should have the opportunity to staircase out to the full 100% value of their property.</p>	<p>Where the need for affordable housing exists and is considered likely to continue to exist – as is the case throughout Bradford District – it is difficult to justify approaches which do not seek to either retain houses in affordable use in perpetuity or achieve the recycling of proceeds from sales into future affordable housing provision.</p> <p>Notwithstanding the above the SPD at present outlines a number of different Low Cost Home Ownership models. Section 4 needs amending as it implies that the Council prefers shared equity / ownership models over discount for sale which is not the case. The Council is happy to negotiate</p>	<p>Amend section 4 of the SPD to remove the indication that the Council will prefer shared ownership and shared equity schemes over discount for sale and to clarify that all forms will be used as appropriate to the scheme, location and developer.</p>

		We would suggest it is necessary to discriminate between areas such as the City Centre and for example, high demand rural areas where shared equity may be deemed more appropriate thus ensuring affordable housing is retained within the community.	shared ownership schemes rather than shared equity in the right circumstances and the wording of the SPD as proposed in these amendments will not prevent this.	
	9.5	<p>The inclusion in the SPD of the requirements for affordable housing delivery is welcomed (paragraph 8.1 of the SPD) as this provides certainty. However, early on in the development process floorspace is a more accessible measure.</p> <p>Affordable housing standards expressed as a percentage of required floorspace rather than number of units would make the trigger point for provision more explicit and be better linked with the Housing Corporation standards (point 3 below).</p>	The Council considers that the expression of affordable housing requirements in terms of the number of units is the simplest approach and the correct one in line with the adopted UDP Policy H9 and national planning policy.	No change.
	9.6	<p>The SPD relays a slightly confusing message by stating where it <i>doesn't want</i> social housing to be located in the city centre (paragraph 3.1, 3.2).</p> <p>Considering the city centre is such a small area, if the SPD is wishing to target specific areas for affordable housing, it would be preferable to have a strategic debate with retailers, businesses and housing providers to develop a strategy for where affordable housing should be located.</p>	<p>The Council does not accept this point. The SPD is extremely clear that there are only a limited number of exceptions where affordable housing will not be required or will be required in the form of commuted sums. The reasoning is also clearly stated. However the Council does accept that the map contained in Appendix 2 could more clearly illustrate the locations concerned.</p> <p>The suggestion of a debate with city centre stakeholders as to where future affordable should be located is a valid one but lies outside the scope and remit of this SPD. Such issues will be considered within the Bradford City Centre AAP.</p>	No change.
	9.7	The SPD reflects the Housing Corporation's	Whether the affordable housing units are cheaper	Make a minor change to

		<p>standards for minimum size of affordable units.</p> <p>It is important to highlight that these standards are higher than the standards being delivered by the market in city centres, especially for 2 and 3 bedroom units. A two bedroom market value unit in Bradford City Centre is typically 500 to 550 sq.ft in size. We understand that the Housing Corporation Standards apply across the UK and do not distinguish by location. However, it is important for the Property Forum to highlight that this will lead to a mismatch in the city centre whereby affordable units will be larger than market units, yet cheaper to purchase.</p> <p>If developers can provide a commuted sum a social housing provider can then provide units to meet the Housing Corporation standard, which does not lead to a distortion in the market.</p>	<p>to purchase is irrelevant – the key issue is whether the units are meeting actual housing need. There is growing recognition that the units being delivered in some city locations by the development industry have been too heavily biased towards small units and are not meeting need particularly for family housing.</p> <p>The Council considers that the inclusion of space standards within the SPD is vital as it will help to ensure that the homes built are not only affordable but are fit for purpose in meeting the accommodation needs of its occupiers. The standards specified are derived from Housing Corporation guidance which Housing Associations are expected to build to in order to qualify for finance and are supported by the Government.</p> <p>The Council notes that the inclusion of space standards is consistent with the planning policies and best practice among other planning authorities in the region and that the approach of the SPD has been supported by BCHA and by Yorkshire Forward.</p> <p>However on the other hand the Council appreciates the need to negotiate each planning application on its merits and that there may be occasions where lower space standards would meet the need of occupiers in an acceptable way. Thus the wording of paragraph 3.7 is to seek such standards rather than require them. However a further minor change to the text of would clarify the flexible nature of the approach.</p>	<p>the text of paragraph 3.7</p>
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			The Council will accept commuted sums instead of provision on site but only where justified by circumstances such as those set out in the SPD. It is important that commuted sums are not the norm otherwise it will be difficult to achieve a balanced housing market across the city centre.	
	9.8	<p>The SPD requests details of the service charge for a development at the point of a planning application (paragraph 5.1).</p> <p>It is impracticable and not feasible to provide this information at this stage as it is only usually calculated on completion of a scheme. Developers typically set aside a budget or have in mind a range of the likely costs prior to completion, but the costs of service charge is subject to fluctuation.</p>	The Council is somewhat surprised that while developers would seek at an early stage to calculate the full range of development costs and they would not seek at the same time to estimate the financial aspects related to service charges. No reason is given in the respondents comments as to why service charges cannot be calculated at the point of the planning application nor why such costs 'are subject to fluctuation.'	No change.
	9.9	<p>The SPD seeks to set a different level of service charge for affordable units compared to open market units (paragraph 5.1).</p> <p>It is acknowledged that the cost of service charge can actually render some units unaffordable. However, the reduction of service charge for affordable units will result in a higher charge for open market units to cover the overall cost. Service charge is very transparent as each occupant is sent a letter which sets out the entire service charge for a scheme and identifies which level (or band) they are to pay.</p> <p>Developers are obliged to be transparent to avoid quibbles and in any event occupants have the right to request the accounts relating to the cost of the service charge and how it is administered. Service</p>	<p>The Council acknowledges that the issue of service charges provides some problems for developers to resolve but it is up to developers to resolve whether they address this via cross subsidisation or via reduction across the board.</p> <p>It is unclear as to why efforts to achieve integrated and mixed tenure development will in any way be affected by setting reduced service charges in those limited occasions where need to maintain the affordability of affordable housing units.</p>	No change.

		<p>charge is calculated by £ per square ft. If affordable units are built to meet Housing Corporation Standards they will actually be larger than some units in a scheme and actually eligible for a higher level of service charge. If rates are reduced for affordable units other residents will soon become aware of this and it would undermine efforts made to achieve integrated, mixed tenure development.</p> <p>Alternatively, developers would need to reduce the overall costs of service charge to make the scheme more equitable for all, but this is a risk in itself as cutting the quality of service is likely to undermine the whole development. If communal facilities are poorly maintained, residents will refuse to pay their service charge leading to a downward spiral.</p>		
	9.10	<p>The SPD states that there is an overall presumption against use of commuted sums <i>except where proposed provision adjoins existing areas of concentration of affordable / social housing at certain city centre locations.</i></p> <p>Bradford Property Forum welcomes this flexibility as RSL's are being told by English Partnership to rely increasingly on commuted sums so as to reduce government subsidy towards the provision of social housing. It would be useful if the 'certain city centre locations' were defined.</p>	<p>The Council notes this supporting comment and acknowledges that the locations where commuted sums will be the preferred approach could be more clearly illustrated in the SPD.</p>	<p>Amend the map in Appendix 2.</p>

DRAFT SUPPLEMENTARY PLANNING DOCUMENT FOR CITY CENTRE AFFORDABLE HOUSING – REPRESENTATIONS ON THE SUSTAINABILITY APPRAISAL REPORT.

Consultee (Name/Organisation)	Representation(s) to Sustainability Appraisal Report for Draft City Centre Affordable Housing SPD	Bradford MDC Response	Outcome
Yorkshire Forward	It is important that the appraisal process is balanced and takes appropriate account of environmental, economic and social objectives. Therefore, it might be helpful if the Local Authority were to increase the number of Economic Objectives to recognise the aims and objectives of the Sub Regional Investment Plan, which seeks to 'Develop skills to create wealth and better employment opportunities. Improve knowledge creation in public, private and voluntary/community sectors. Promote innovation in manufacturing and service sectors. Promote e-commerce, new technology, financial services, cultural industries, and revitalise established employment base'.	<i>The Sustainability Indicators used to appraise the draft SPD were those used to appraise the RUDP. A recent Sustainability Appraisal Scoping Report for the LDF was published which updated the objectives and indicators. The Sustainability Objectives related to the economy and employment have been suggested to be: Education & Training (promote education and training opportunities which build the skills and capacity of the population), and Local Economy & Employment (increase the number of high quality job opportunities suited to the needs of the local workforce, and support investment and enterprise that respects the character and needs of a local area). -</i>	These comments will not affect the SA of the draft SPD as it was deemed more appropriate to use Sustainability Indicators which were used to appraise the RUDP as Policy H9 is the parent policy for the draft SPD. The comments will be addressed in the SA for the LDF.

2: Statement of Sustainability Appraisal

INTRODUCTION

1. Article 9 of the European Directive (2001/42/EC), known as the Strategic Environmental Assessment (SEA) states that on adoption of a plan or programme (in this case a Supplementary Planning Document), a statement should be prepared setting out how environmental considerations have been integrated in to the Plan (the SPD). This is also reflected in the guidance document produced by the ODPM in 2006 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents', and the PPS12 Companion Guide. The statement should also include how the SPD has changed as a result of the appraisal process and the responses to the consultation; or why no changes were made. It should also include information on how the monitoring of the implementation of the document will be carried out.

2. This report satisfies the requirements of the European Directive and Government legislation and regulations as set out above.

INTEGRATION OF ENVIRONMENTAL CONSIDERATIONS

3. The Sustainability Appraisal is an iterative process, and continual appraisal of the effects of the SPD enables identification of areas where the SPD can be strengthened to ensure it achieves the sustainability objectives.

4. The Sustainability Appraisal process was undertaken during preparation of the SPD, and the representations received on both the draft SPD and the Sustainability Appraisal, have resulted in changes to the amended SPD (as adopted).

CONSULTATIONS

5. Consultation was carried out on the Sustainability Appraisal Scoping Report in January 2007 with the statutory consultees.

7. Consultation on the draft SPD and Sustainability Appraisal Report was carried out for six weeks between April and May 2007.

8. Sixty one representations were received on the draft SPD, and one representation were received on the Sustainability Appraisal Report.

9. All comments have been analysed and the Council has provided a response to every one, as well as indicating changes to the SPD. The summary of representations and details of the consultation can be found in the Statement of Consultation.

10. Amendments were made to the SPD in response to comments made, but none were considered so great as to result in the document being reappraised. Many of the amendments related to emphasising that the 'parent policy' H9 of the RUDP had not changed, confirming the fact that the Council will continue to negotiate affordable housing contribution at the time of the application and take account of site economics and updating the national and regional policy background. Additional information was added to the SPD relating to the Council's approach to securing commuted sum payments in order to give greater certainty to developers when preparing their schemes and thus to speed up the planning application process.

SELECTION OF THE ADOPTED SPD

11. During the production of the SPD and Sustainability Appraisal, two options were considered, the first was production of the SPD, and the second was the “business as usual” approach.

12. If the SPD was not prepared, those involved in the determination of planning applications, would have to rely on the generality of national, regional and local planning policy. The absence of an SPD would adversely affect the implementation of the policies on the Replacement UDP, offer less certainty of stakeholders, and allow the Section 106/278 process to remain complex, slow and inconsistent. Ultimately less affordable housing units would probably be secured.

13. Adoption of the SPD would provide further information and guidance to all participants in the development control process and therefore help to implement the policies of the Replacement UDP.

MONITORING

14. Monitoring of the implementation of the SPD will be incorporated into the Annual Monitoring Report. This Report will give an indication of the performance of the SPD and contains key indicators such as the number of affordable housing completions. It is anticipated that more targets will be identified in the future. Effective monitoring will allow the Council to identify any issues with the SPD and will enable any work to improve the SPD to be carried out.

CONCLUSION

15. The Supplementary Planning Document for Planning Obligations has been prepared and has developed simultaneously with the sustainability appraisal of the effects of implementing the SPD. It has been concluded that its implementation will, overall, have a positive impact on achieving the sustainability objectives. Monitoring of the effects of the SPD will highlight any areas where it is felt the SPD is not working properly and is resulting in negative effects, and where review of the document is needed.

Produced by the
City of Bradford Metropolitan
District Council

Local Development
Framework Group

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