

**Supplementary Planning Document:  
District Wide Affordable Housing**

**Scoping Report**

**LOCAL DEVELOPMENT FRAMEWORK FOR BRADFORD**  
**Supplementary Planning Document**  
**District Wide Affordable Housing SPD Scoping Report**

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## **1.0 Introduction**

- 1.1 The Council is committed in the revised Local Development Scheme (December 2007) to the preparation of a new Affordable Housing Supplementary Planning Document (SPD) in support of the saved policies in the Replacement Unitary Development Plan (adopted October 2005). This document is part of the evidence gathering and preparation stage for producing the draft District Wide Affordable Housing SPD. The role of this document is to engage key stakeholders and the public in considering the key issues that the SPD could and should be addressing and the possible approaches, which the document can adopt to address these issues.
- 1.2 The final SPD needs to be soundly based on the available evidence taking into account; national, regional and local policies and strategies, the views of the stakeholders and the community as well as the findings of the sustainability appraisal. The comments on this scoping report will inform the draft SPD, which will then in turn be published for comment before it is adopted. Once adopted the SPD will be given weight in the determination of planning applications.
- 1.3 The SPD itself must conform to the relevant policies in the RUDP, which set the broad parameters within which, the approach in the SPD must accord. The Affordable Housing SPD supports the saved policies (H9 & H10) on Affordable Housing in the adopted RUDP and the text in paragraphs 6.29 to 6.41. The detailed wordings of the relevant policies are set out in Appendix I.
- 1.4 The purpose of the SPD will be to:
- Expand upon and provide further detail to the affordable housing policies in the RUDP to provide clarity for applicants, developers and the public on how the RUDP policies will be applied and interpreted.
  - Ensure affordable housing policy is in conformity with current national and regional planning policy.
  - Encourage consistent decision making.
  - Apply best practice and experience in securing affordable housing through the planning process.

- 1.5 Please let us know what you think by **5pm, Monday the 27th October 2008** so we can take your views into account in preparing the draft SPD. Comments should be sent to:

Bradford Local Development Framework  
FREEPOST NEA 11445  
PO Box 1068  
BRADFORD  
BD1 1BR.

Or emailed to:

[lfd.consultation@bradford.gov.uk](mailto:lfd.consultation@bradford.gov.uk)

- 1.6 The information you give will be used in accordance with the Council's registration under the Data Protection Act 1998. Responses will be held on a database and be available for public inspection, upon request until the LDF is adopted.

## Questions

### Question 1

What should the content of the affordable housing SPD cover?

### Question 2

Which areas of the RUDP policies need expanding on and clarifying?

## **2.0 Policy context**

2.1 In drafting the SPD a range of considerations need to be examined, which will shape the key issues and ultimately the approach to be adopted. These include:

- Current RUDP policy
- National, regional and local policy/strategies
- Assessments/baseline information
- Good practice

2.2 These are considered briefly below. Further detail on these can be found in Appendix III.

2.3 The Local Development Framework (LDF) will gradually take over the role of the Replacement Unitary Development Plan (RUDP), adopted in October 2005, to provide the land-use planning framework for the District. The RUDP currently identifies the land use strategy and allocations to meet development needs in the District to 2014, with detailed policies for the control of development.

2.4 The policies of the RUDP are saved until at least October 2008 and will continue to be used for determining planning applications in advance of the adoption of the LDF documents in due course. The Affordable Housing SPD is being prepared to support the effective implementation of several of the saved RUDP policies, particularly those relating to provision of affordable housing (H9 and H10).

### **Replacement Unitary Development Plan (2005)**

2.5 The role of the SPD will be to expand upon the policies in the RUDP rather than introduce fundamental policy changes. If such changes are needed by virtue, for example, of fundamentally different national/regional policy, then this will be the role of the LDF.

2.6 The District Wide Affordable Housing SPD will elaborate on Policies H9 and H10 in the RUDP. Policy H9 sets out the principles of providing affordable housing and elaborates on details for developers and residents in the

accompanying text. Policy H10 sets out the principals for affordable housing development in rural areas in terms of an 'exception' policy. The detailed wording of all these policies is found in Appendix I.

- 2.7 The RUDP took the approach to set out broad principals in the policy in order not to be too prescriptive, with more detailed definitions in the text. Such an approach has allowed for a degree of flexibility in negotiating the form, scale and type of affordable housing contribution on a site by site basis at the time of the planning application. This, in the council's opinion, means that it is appropriate to revisit these details and thresholds in the SPD, as the broad policy itself will remain unaltered.

### **National Policy**

- 2.8 Since the adoption of the RUDP the policy framework for housing has changed with PPG3 being replaced by PPS3. Some of the key changes are:
- Affordable housing has a stronger focus throughout PPS3 than PPG3.
  - A new definition of affordable housing.
  - A lower threshold of 15 dwellings.
  - A new emphasis on the promotion of mixed communities.
  - An increased emphasis on delivering affordable housing in rural areas and smaller villages.

#### Planning Policy Statement 3: Housing (November 2006)

- 2.9 Planning Policy Statement 3: Housing (PPS3) underpins the delivery of the Government's strategic housing policy objectives with the goal of ensuring that everyone has the opportunity to live in a decent home, which they can afford in a community where they want to live. PPS3 emphasises the Government's commitment to providing high quality housing for people who are unable to access or afford market housing and states that Local Planning Authorities (LPAs) should aim to ensure that the provision of affordable housing meets the needs of both current and future occupiers.
- 2.10 The Government defines affordable housing as including social rented and intermediate housing. PPS3 provides the current definition of affordable housing. The full definitions can be found in Appendix II.

Delivering Affordable Housing (November 2006)

- 2.11 This document is to be read in conjunction with PPS3, and sets out the government's aims for affordable housing policy. These include:
- Providing high quality homes in mixed sustainable communities for those in need;
  - widening the opportunities for home ownership,
  - offering greater quality, flexibility and choice to those who rent.
- 2.12 The document outlines the role for LPAs in delivering affordable housing and states that the LDF and its constituent Local Development Documents play a key role in providing affordable housing.

Housing Green Paper: Homes for the future: more affordable, more sustainable (July 2007)

- 2.13 This Housing Green Paper seeks views on the Government's proposals to increase the supply of housing, to provide well designed and greener homes that are supported by infrastructure and to provide more affordable homes to buy or rent. In relation to affordable housing, an £8 billion programme for affordable housing is proposed for 2008-11, which is a £3 billion increase compared to the previous 3 years. 70,000 affordable homes per year are to be provided by 2011, with increases in shared ownership and shared equity housing funded by the Housing Corporation. In line with the recent PPS3 the paper puts increased emphasis on providing rural affordable housing, including in small villages. Council's are encouraged to investigate whether the allocation of sites solely for affordable housing is justified.

**Regional Policy**Regional Spatial Strategy: The Yorkshire and Humber Plan 2008

- 2.14 The Yorkshire and Humber Plan was published in May 2008. It forms the new Regional Spatial Strategy (RSS) for the Region. Public consultation took place on the draft Plan in 2006 and an Examination in Public was held to test the Plan from September 2006. Consultation on the Secretary of State's Proposed Changes to the draft Plan took place between September and December 2007.

- 2.15 The RSS contains two policies, which are relevant to affordable housing provision in the region:
- H4 The Provision of Affordable Housing
  - H5 Housing Mix
- 2.16 Policy H4 sets out indicative estimates for the proportion of new housing that may need to be affordable across the region. As is recognised in the Regional Housing Strategy, there are differences across the region in terms of affordability (appendix IV).
- 2.17 Provisional estimates of the proportion of new housing that may need to be affordable are as follows:
- Over 40% in North Yorkshire districts and the East Riding of Yorkshire
  - 30-40% in Kirklees, Leeds, Wakefield and Sheffield
  - Up to 30% in other parts of South and West Yorkshire, Hull, North Lincolnshire and North East Lincolnshire.
- 2.18 It is likely that there will be considerable variety in what is required within the districts. These figures will be reviewed in the light of the findings from emerging Strategic Housing Market Assessments.
- 2.19 Policy H5 states that plans should ensure the provision of homes for a mix of households that reflects the needs of the area.

### **Local Policy**

#### **A Decent Home in a Decent Neighbourhood: Joint housing Strategy 2003-2010**

- 2.20 One of the strategy's strategic objectives is to ensure a sufficient supply of homes, particularly affordable, in the places where people need it, including the city centre. This includes a target to negotiate an element of affordable housing at the following quotas in line with the RUDP:
- Wharfedale- 40%
  - Bingley/Baildon/Shipley- 30%
  - The villages- 25%
  - Bradford and Keighley Inner City and Suburbs- 15%



Bradford 2020 Vision/ Corporate Plan-Citizens First

- 2.21 Housing is a key element within the community strategy and the strategy recognises and acknowledges the wider impact and benefits to be gained from a robust Housing Strategy.
- 2.22 The affordable housing policies included in the SPD will need to support the council's Corporate priorities as set out in the Corporate Plan 2007-2010, in particular 'creating a more prosperous' district and 'safer and stronger communities'.

Planning Obligations SPD

- 2.23 The Planning Obligations SPD is a material consideration in determining planning applications. Therefore, to ensure a consistency of approach its contents need to influence the development of this SPD, where relevant. The SPD sets out the council's approach to planning obligations.

AssessmentsBradford district Local Housing Assessment (LHA) 2008

- 2.24 The report highlights that affordability ratios for the Bradford district are slowly increasing, though they are still below those of West Yorkshire and the wider Region. The annual shortfall of affordable housing supply is currently estimated to be in the region of 1,150 – 1,400 units per year, depending on the source of population and household projections used for the housing need model. A household needs to earn around £25,000 to afford to buy at entry level price across the Bradford District. 55% of households across the District earn below this. A single person would need to earn £20,857, 45% earn below this in the District.
- 2.25 The LHA split the district into three quota areas; high, medium and low (appendix V). Within these, the affordable housing need was broken down by number, type and size. The high quota area has acute affordability pressures. House building in the high quota area justifies the need for the highest quota to be implemented, to ensure opportunities to deliver affordable housing are maximised.

Annual monitoring report

- 2.26 The AMR 2007 states that in 2007 233 affordable units were completed. In 2006 there were 116 completions and 181 in 2005

	Gross completions	Net completions
Affordable housing 2007	245	233
Affordable housing 2006	162	116
Affordable housing 2005	181	181

Best Practice Examples

- 2.27 The process of preparing an SPD should take account of best practice examples from other sources. Bradford MDC acknowledge that the content of the SPD needs to be right for Bradford's district and issues, however one issue for the SPD to consider is consistency with other adjoining authorities and authorities within the Strategic Housing Market Area regarding affordable housing policy. Set out below are links to other local authorities progress on affordable housing SPDs in the sub-region.

York City Council

[http://www.york.gov.uk/environment/Planning/guidance/affordable\\_housing/](http://www.york.gov.uk/environment/Planning/guidance/affordable_housing/)

- 2.28 The city has been very successful in delivering affordable housing through the planning system. The council has produced an affordable housing note SPG that requires 50% affordable housing on residential developments above 15 dwellings or 0.3 hectares. This requirement is supported by housing need information. The SPG also sets out the process of negotiation for affordable homes and best practice. Other aspects of affordable housing such as design, quality and pepper potting are also outlined.

Leeds City Council

[http://www.leeds.gov.uk/Environment\\_and\\_planning/Planning/Local\\_development\\_framework/](http://www.leeds.gov.uk/Environment_and_planning/Planning/Local_development_framework/)

- 2.29 Leeds City Council has begun work to produce a Supplementary Planning Document (SPD) on Affordable Housing. As part of the pre-production work

Leeds held two half-day seminars/workshops to discuss the core areas of the Supplementary Planning Document.

#### Kirklees Council

<http://www.kirklees.gov.uk/business/planning/ldf/ldf.shtml#ldf2>

- 2.30 Kirklees have produced a sustainability appraisal Scoping report for The Provision of Affordable Housing in New Housing Developments SPD. The report considers the key sustainability issues, provides background and baseline information and sets out the draft strategic objectives of the SPD.

#### Harrogate Borough Council

<http://www.harrogate.gov.uk/immediacy-2307>

- 2.31 Harrogate have produced a draft Homes for Local People SPD. This SPD will provide the Council's Guidance on how Core Strategy policies on Affordable Housing will operate.

#### Calderdale Council

<http://www.calderdale.gov.uk/environment/planning/development-framework/index.html>

- 2.32 Calderdale have carried out community consultation on their draft affordable housing SPD

### **Questions**

#### **Question 3**

Should the SPD look for consistency with other adjoining authorities and authorities within the Strategic Housing Market Area regarding affordable housing policy?

#### **Question 4**

Are there any best practice examples that would be relevant for this SPD?

### **Other considerations**

#### Sustainability Appraisal

- 2.33 Under the Planning and Compulsory Purchase Act 2004, all SPDs must be subject to a Sustainability Appraisal (SA) to ensure that the implementation of guidance in the SPD will not have an adverse effect on the environment and to identify to what extent the social, economic, and environmental principles of sustainable development are achieved.

- 2.34 In preparing the SPD, there is a three-stage process of pre-production, production, including a consultation period, and adoption following consideration of consultation responses. The evidence gathering and early preparation of the draft SPD coincide with first stage of preparing the sustainability appraisal, which is known as scoping.

### **3.0 Key Issues**

#### **Definition of affordable housing**

##### Issue

- 3.1 PPS 3 provides the Government definition for affordable housing. It also defines social rented and intermediate affordable housing (Appendix II). Intermediate affordable housing is stated as being at prices and rents above those of social rent, but below market price or rents.

##### **Questions**

###### **Question 5**

Is affordable housing correctly defined, if not how should it be defined?

###### **Question 6**

Should the SPD outline at what level intermediate housing should be above/below social and market price or rents?

#### **Need for affordable housing**

##### Issue

- 3.2 Affordability is becoming a growing issue for parts of the Bradford district. The LHA 2008 report identifies that the annual shortfall of affordable housing supply is currently estimated to be in the region of 1,150 – 1,400 units per year.

##### **Questions**

###### **Question 7**

Do you agree with the estimated shortfall of affordable housing in the district?

###### **Question 8**

If so, how could this need best be met and what proportion of this need can realistically be met through Section 106 agreements?

## **Thresholds**

### **Issue**

- 3.3 This is an important issue because it defines at what level the development of affordable housing will be sought. PPS3 suggests that the national indicative threshold is 15 dwellings but that lower thresholds may be used where this can be justified.
- 3.4 There may be a need to consider reducing the threshold further to reflect local circumstances. For instance, there is unlikely to be any large scale housing development in rural areas, where there maybe an acute need for affordable housing. Reducing thresholds would, therefore, possibly mean that some of the need in rural areas could be addressed. However, this would need to be balanced against the issues of site viability and potentially reducing the supply of housing, as a fair amount of development in rural areas would potentially come from infill plots which are generally small developments, often where it would not be feasible to require affordable housing or a commuted sum.

### **Questions**

#### **Question 9**

Should the threshold for seeking the provision of affordable housing be set at 15 or more dwellings or would it be more appropriate to set a lower threshold? If so, what should this threshold be and what reason would there be for setting a lower/higher threshold?

#### **Question 10**

Which areas would possibly require a lower threshold to be applied?

#### **Question 11**

Should a range of thresholds be identified for different areas? If so, how should appropriate thresholds and areas be identified?

## **Targets**

### **Issue**

- 3.5 PPS3 advises that where a need for affordable housing is identified then a target for the provision of affordable housing as a number or proportion of

overall housing level should be identified, including where appropriate targets for social rented and intermediate housing.

3.6 The RSS sets out provisional estimates of the proportion of new housing that may need to be affordable are as follows:

- Over 40% in North Yorkshire districts and the East Riding of Yorkshire
- 30-40% in Kirklees, Leeds, Wakefield and Sheffield
- Up to 30% in other parts of South and West Yorkshire, Hull, North Lincolnshire and North East Lincolnshire.

3.7 These figures were defined before local evidence is in place and thus they are recognised as provisional.

3.8 The Joint Housing Strategy (JHS) (2003-2010) reflects the UPD in applying varying quotas to private housing developments, based on need in different market areas, through policies of the UDP and the Development Control process. The JHS expresses the quotas as a percentage of the total development by Housing Market Area. They are:

- Wharfedale- 40%
- Bingley/Baildon/Shipley- 30%
- The villages- 25%
- Bradford and Keighley Inner City and Suburbs- 15%

3.9 Any targets clearly need to be both realistic and achievable and will need to be balanced against ensuring that developments remain financially viable, as advised in PPS3. They need to reflect both the scale of affordable housing need in different areas and the scale of allocations in that area, which are able to generate an affordable housing contribution.

3.10 There is also the issue of whether any targets should be the same across all sites or if it would be more appropriate to have a number of thresholds with different targets for each threshold. For example, there could be a target of 30% for sites of 15 or more dwellings, while smaller sites could have a lower target. This could enable more developments to contribute towards the provision of affordable housing. However, again an important consideration

would be to ensure that the viability of any particular development was not affected.

### Questions

#### Question 12

Is it appropriate for the SPD to set affordable housing targets? If so, should the current targets be amended?

#### Question 13

Are the market areas and targets identified in the JHS and RUPD correct? If not, what should the market areas/targets be?

#### Question 14

Should the targets be different according to the size of a site (as in the draft city centre affordable housing SPD)?

### Tenure

#### Issue

- 3.11 Across the district there may be affordable housing need for different tenures in terms of social rented or intermediate affordable housing. PPS3 indicates that “*separate targets should be set for social-rented and intermediate housing where appropriate*”. Government policy would appear to suggest that it would be appropriate for the type of tenure that will be sought to be specified.

### Questions

#### Question 15

Should the affordable housing SPD address the issue of tenure or should this be left to the LDF?

#### Question 16

If so, should the SPD specify in general terms, the tenure of affordable housing that will be sought in particular areas of the district or should it be considered as part of the planning application process i.e. on a site by site basis?



**Property types/property sizes****Issue**

- 3.12 PPS3 specifically indicates that the “*size and type of affordable housing required*” likely to be needed in particular locations should be identified in local development documents. The LHA 2008 breaks down the need for affordable housing by size, type and affordable demand area. This has potential implications for the type of properties that should be provided across the district.
- 3.13 Therefore, the issue is whether it would be appropriate for the SPD to tackle this matter or whether this is a more strategic issue which should be addressed in the LDF? However, the SPD could inform negotiations by setting out guidance on the types and sizes of dwellings needed in different market areas?
- 3.14 An issue is how should an appropriate mix be sought? For example, should guidance be set for out different property types e.g. flats, bungalows and houses? Some form of guidance may be appropriate in order to ensure that any identified need can be met. A balance will need to be made between the amounts of affordable housing delivered against the types of properties sought.
- 3.15 Again the same issue arises in the case of property size. The LHA also breaks down the need by size and affordable demand area. This raises the question as to whether the SPD should seek to include guidance in respect of the size of properties required. However, again the issue is one of flexibility and how this could best be achieved.

**Questions****Question 17**

Should the SPD require that a mix of property types be required on developments, relating to the need identified in the LHA? If not, would some form of guidance be appropriate?

**Question 18**

Should the SPD require that a mix of property sizes be required on developments involving affordable housing? If not, would some form of guidance be appropriate?

## **Design and Quality**

### **Issues**

- 3.16 Ideally affordable homes should be visually indistinguishable from their private counterparts. They should be of a high quality and design, affording future occupants a good level of residential amenity, which meets their housing needs.
- 3.17 In order to avoid the negative implications of social exclusion and isolation, affordable homes within housing schemes can be distributed in a number of areas. This is termed '*Pepper-potting*' and can help support the development of sustainable mixed and balanced communities.
- 3.18 The quality of the affordable housing units is also of importance. There are a range of standards that affordable housing is expected and required to meet. Examples of which include:
- Housing corporation Scheme Development Standards
  - The Lifetime Homes Standard
  - Buildings for Life
  - Code for Sustainable Homes

### **Questions**

#### **Question 19**

Should the affordable housing SPD seek ensure that affordable homes are built to high quality and design, and if so how should this be done?

#### **Question 20**

Should the SPD have general guidance regarding pepper potting of affordable housing or should this be considered on a site by site basis?

#### **Question 21**

Where properties are to be provided by a developer, should the SPD set out any quality standards with which they will be expected to comply?  
If so, which standards should be required/expected?

## **Rural affordable housing**

### **Issue**

- 3.19 In rural areas the need for affordable housing is often the most acute and yet the amount of available land for residential development is often limited and site size small. This can limit the potential to meet affordable housing need in these areas.
- 3.20 Policy H10 in the RUDP sets out the council's current approach to providing affordable housing in rural areas through an 'exceptions' policy advised through PPG3. This policy permits affordable housing development in rural areas, which meets a proven need on land that would not normally receive planning permission for residential development.
- 3.21 PPG3 has now been superseded by PPS3. PPS3 states that "*where viable and practical, Local Planning Authorities should consider allocating and releasing sites solely for affordable housing, including using a Rural Exception Site Policy*".
- 3.22 Under the new development plan system, as set out in the Planning and Compulsory Purchase Act 2004, sites can only be allocated in Development Plan Documents that comprise the LDF. However sites cannot be allocated in SPDs. Therefore, the affordable housing SPD would not be able to allocate sites under the rural exception site policy. However, the SPD could elaborate on policy H10 in the RUDP and provide further guidance.

### **Questions**

#### **Question 22**

How should the rural affordable housing issue best be addressed in the SPD?

#### **Question 23**

What aspects, if any, of the policy H10 relating to rural exceptions would benefit from further elaboration/clarification.

**On or off-site provision/commuted sums****Issue**

- 3.23 PPS3 suggests that, where on-site provision is not required as part of a development and/or a financial contribution is required, the LPA should set out the circumstances in which such an approach would be appropriate. It may be considered that only in exceptional cases should provision be made off-site.
- 2.24 An option for the SPD would be to set out the type of circumstances where off-site provision would be appropriate (e.g. where the site characteristics or requirements would make it unviable for on-site provision).
- 2.25 In the event that a financial contribution is to be made instead of on-site provision, the SPD may need to consider how such a contribution would be calculated. This would need to be robust and transparent. Where a financial contribution is taken it would need to be clear how the money would be used to provide additional affordable housing.

**Questions****Question 24**

Should off-site provision (which could include a financial contribution) only be agreed in exceptional circumstances? If so, what would constitute 'exceptional circumstances'? Would it be better to treat each case on its merits?

**Question 25**

How should the level of financial contribution required in lieu of on-site provision be calculated?

**Site Viability**

- 2.26 In some cases on-site provision may not be appropriate because it would undermine the financial viability of a scheme. However, the Council would need to be sure that this was the case. Therefore, would it be appropriate for the SPD to set out a financial viability test to be applied in such circumstances?

**Questions****Question 26**

Should the SPD require that a financial viability test be undertaken where it is suggested that either the on-site provision of affordable housing or meeting the Council's requirements would affect the financial viability of a proposed development? If so, how could this be done?

**Process to be followed for schemes involving affordable housing****Issue**

- 2.27 Negotiations where affordable housing is involved often require considerable input. Setting out the expected process to be followed could help speed up the process and make it more transparent and understandable for all parties.

**Questions****Question 27**

Should the affordable housing SPD set out the process for considering schemes involving affordable housing?

**Other Issues**

- The level of discount on market value required for affordable housing.
- Potential financial contributions, for instance to fund a valuation officer.
- Preferred delivery options e.g. social homebuy/discounted rent/discount for sale.
- Preferred Registered Social Landlords (RSL's).
- The cost of service charges and their impact on affordability.

## **Questions**

### **Question 28**

What should the level of discount on market value rents and prices for affordable housing be and how should this be calculated?

### **Question 29**

Should financial contributions be required to aid the process of delivering affordable housing?

### **Question 30**

Should the SPD set out the preferred delivery options and list of preferred RSL's?

### **Question 31**

Should the SPD address the issue of service charges?

### **Question 32**

Are there any other issues which have not been covered in this report that you feel it would be appropriate for the SPD to cover?

## **4.0 What happens next?**

- 4.1 All the comments made at this stage will be considered in the preparation of the draft SPD. The Council is then expected to publish the Draft SPD and accompanying sustainability appraisal report in 2008 for comment. Once representations on the draft SPD have been considered and changes made, then the document will be adopted.

### Further information

- 4.2 For more information about developing the SPD or any other aspect of the Local Development Framework please contact:

Local Development Framework Group

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Tel: 01274 434050

Fax: 01274 433767

Email: [Ldf.consultation@bradford.gov.uk](mailto:Ldf.consultation@bradford.gov.uk)

Or visit our web-site at: <http://www.Bradford.gov.uk/LDF>

## Appendix I

**RELEVANT REPLACEMENT UNITARY DEVELOPMENT PLAN POLICIES****Replacement UDP (2005)**

Objective 5 of the JHS is to “*Ensure a sufficient supply of affordable and social rented housing in the places where people need it*”. Action to achieve this involves the application of varying quotas to private housing developments for the provision of affordable housing, based on need in different market areas, through policies of the UDP and the Development Control process. The JHS expresses the quotas as a percentage of the total development by Housing Market Area.

They are:

Wharfedale 40%

Airedale 30%

The Villages 25%

Bradford and Keighley Inner and Suburbs 15%

Policy H9 states:

**“On planning applications for substantial residential development the Council will negotiate for a proportion of affordable housing based on the extent and type of need, the suitability of the site or building in the case of conversions, and the economics of provision.”**

Policy H10 states:

**“the council will permit affordable housing development in rural areas which meets a proven local need that cannot be accommodated in any other way, on land that would not normally receive planning permission for residential development provided that it satisfies all the following criteria:**

- (1) It would not undermine the purposes of the green belt in that area**
- (2) It is within the settlement or forms a small scale natural extension to it**
- (3) It has satisfactory arrangements that both ensure the housing remains affordable and reserves the housing for local needs. These arrangements shall remain in force in perpetuity.**



## APPENDIX II

**Affordable Housing Definitions as defined by PPS3: Housing****Affordable housing is:**

‘Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision’.

**Social rented housing is:**

‘Rented housing owned and managed by local authorities and registered social landlords, for which guideline target rents are determined through the national rent regime. The proposals set out in the Three Year Review of Rent Restructuring (July 2004) were implemented as policy in April 2006. It may also include rented housing owned or managed by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Housing Corporation as a condition of grant.’

**Intermediate affordable housing is:**

‘Housing at prices and rents above those of social rent, but below market price or rents, and which meet the criteria set out above. These can include shared equity products (e.g. HomeBuy), other low cost homes for sale and intermediate rent.’

## APPENDIX III

### Detailed Policy Context

#### National Planning Policy

#### Planning Policy Statement 3: Housing

##### Affordable housing

27. The Government is committed to providing high quality housing for people who are unable to access or afford market housing, for example, vulnerable people and key workers as well as helping people make the step from social-rented housing to home ownership. This section should be read together with the Government's Affordable Housing Policy Statement.<sup>18</sup> The Government defines affordable housing as including social rented and intermediate housing.

28. In the context of creating mixed communities, Regional Spatial Strategies should set out the regional approach to addressing affordable housing needs, including the affordable housing target for the region and each housing market area.

29. In Local Development Documents, Local Planning Authorities should:

- Set an overall (ie plan-wide) **target** for the amount of affordable housing to be provided. The target should reflect the new definition of affordable housing in this PPS.<sup>19</sup> It should also reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing, including public subsidy and the level of developer contribution that can reasonably be secured. Local Planning Authorities should aim to ensure that provision of affordable housing meets the needs of both current and future occupiers, taking into account information from the Strategic Housing Market Assessment.

18 See *Delivering Affordable Housing* Policy Statement, Communities and Local Government, November 2006.

19 See new definition at Annex B.

- **Set separate targets for social-rented and intermediate affordable housing** where appropriate. A sufficient supply of intermediate affordable housing can help address the needs of key workers and those seeking to gain a first step on the housing ladder, reduce the call on social-rented housing, free up existing social-rented homes, provide wider choice for households and ensure that sites have a mix of tenures.

– **Specify the size and type of affordable housing** that, in their judgement, is likely to be needed in particular locations and, where appropriate, on specific sites. This will include considering the findings of the Strategic Housing Market Assessment and any specific requirements, such as the provision of amenity and play space for family housing, and, where relevant, the need to integrate the affordable housing into the existing immediate neighbourhood and wider surrounding area.

– **Set out the range of circumstances in which affordable housing will be required.** The national indicative minimum site size threshold is 15 dwellings. However, Local Planning Authorities can set lower minimum thresholds, where viable and practicable, including in rural areas. This could include setting different proportions of affordable housing to be sought for a series of site-size thresholds over the plan area. Local Planning Authorities will need to undertake an informed assessment of the economic viability of any thresholds and proportions of affordable housing proposed, including their likely impact upon overall levels of housing delivery and creating mixed communities. In particular, as the new definition of affordable housing excludes low cost market housing, in deciding proportions of affordable housing to be sought in different circumstances, Local Planning Authorities should take account of the need to deliver low cost market housing as part of the overall housing mix.

– Set out the **approach to seeking developer contributions** to facilitate the provision of affordable housing. In seeking developer contributions, the presumption is that affordable housing will be provided on the application site so that it contributes towards creating a mix of housing. However, where it can be robustly justified, off-site provision or a financial contribution in lieu of on-site provision (of broadly equivalent value) may be accepted as long as the agreed approach contributes to the creation of mixed communities in the local authority area.

30. In providing for **affordable housing in rural communities**, where opportunities for delivering affordable housing tend to be more limited, the aim should be to deliver high quality housing that contributes to the creation and maintenance of sustainable rural communities in market towns and villages. This requires planning at local and regional level adopting a positive and pro-active approach which is informed by evidence, with clear targets for the delivery of rural affordable housing. Where viable and practical, Local Planning Authorities should consider allocating and releasing sites solely for affordable housing, including using a **Rural Exception Site Policy**. This enables small sites to be used, specifically for affordable housing in small rural communities<sup>20</sup> that would not normally be used for housing because, for example,

they are subject to policies of restraint. 20 Small rural settlements have been designated for enfranchisement and right to acquire purposes (under Section 17 of the *Housing Act 1996*) by SI 1997/620-25 inclusive and 1999/1307.

Rural exception sites should only be used for affordable housing in perpetuity. A Rural Exception Site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities.

### **Regional Policy**

#### **Yorkshire and Humber Plan 2008**

Policy H4 sets out the specific regional guidance for affordable housing:

#### **POLICY H4: The provision of affordable housing**

**A The Region needs to increase its provision of affordable housing. Plans, strategies, programmes and investment decisions should ensure the provision of affordable housing to address the needs of local communities.**

**B LDFs should set targets for the amount of affordable housing to be provided. Provisional estimates of the proportion of new housing that may need to be affordable are as follows:**

- **Over 40% in North Yorkshire districts<sup>24</sup> and the East Riding of Yorkshire**
- **30-40% in Kirklees, Leeds, Wakefield and Sheffield**
- **Up to 30% in other parts of South and West Yorkshire, Hull, North Lincolnshire and North East Lincolnshire.**

12.32 Housing has become less affordable in the region in recent years. The delivery of more new homes in line with policy H1 will help to tackle this, but there will also be a need to increase the supply of affordable homes for those that cannot afford to buy or rent on the open market. PPS3 requires LDFs to set targets for the amount of affordable homes needed. As is recognised in the Regional Housing Strategy, there are differences across the region in terms of affordability (see Figure 12.3). Part B of policy H4 reflects these differences and sets out interim, indicative estimates of the proportion of new housing that may need to be affordable. The

figures are set out for districts, but it is likely that there will be considerable variety in what is required within districts. The figures will need to be reviewed in the light of findings from emerging strategic housing market assessments.

12.33 The planning system has a key role in delivering affordable housing through the allocation of sites for development and the use of planning obligations or planning conditions to ensure appropriate proportions of affordable housing where there is a demonstrable need. In view of the worsening affordability in the region, local authorities should give early priority to providing more affordable housing through the planning system drawing their evidence from Strategic Housing Market Assessments and other more detailed local assessments. Affordable housing provision through the planning system will

12.34 The greatest challenge to affordable housing delivery will be in the rural areas and certain towns and cities such as Harrogate and York where the housing market is strong. The Regional Housing Strategy 2005 stresses the value of joint working and includes some good examples of this and of innovative delivery.

12.35 The pattern and scale of need for affordable housing is likely to change over time and the implementation of policies in the RSS should address this. In particular interventions to make urban areas more attractive to live will help to reduce the scale of out-migration to rural areas, thereby reducing the pressure on the rural housing stock.

#### **POLICY H5: Housing mix**

**A Plans, strategies, investment decisions and programmes should ensure the provision of homes for a mix of households that reflects the needs of the area, including homes for families with children, single persons, and older persons, to create sustainable communities.**

**B The cities and towns in the Regeneration Priority Areas, and the larger coastal towns, would particularly benefit from a change in the current mix of housing provision.**

**C Throughout the Region, further work at the local level to identify the shortcomings of the current stock in relation to the needs of the area will help in focusing the interventions in the areas identified above and any other areas identified through local evidence**

12.36 Sustainable, mixed communities require a variety of housing in terms of size, type, tenure and price to meet the needs of different households. In parts of the Region the current mix of housing stock is not helping to create sustainable, cohesive and tolerant communities where people want to live and continue to live, and which are able to respond to people's housing aspirations as they change and develop.

Demographic changes mean that over the Plan period the number of older person households will rise significantly meaning that there will be a requirement to change the housing offer to meet

those particular needs. There will also be growth in the number of single person households. In recent years, in some parts of the region, there has been a significant increase in the provision of smaller homes, including flats. However, in some areas there has been a shortage of new homes suitable for families with children. Detailed analysis through strategic housing market assessments and other local work will inform the implementation of policy H5.

12.37 In advance of the findings of strategic housing market assessments, part B of policy H5 identifies those parts of the region where the current mix of housing needs to change based on previous local housing market assessment work, the Regional Housing Strategy and analysis carried out by the housing market renewal Pathfinder. This suggests that it is within cities and towns within the regeneration priority areas identified in YH1 and shown on the Key Diagram, plus the larger coastal towns (for example Scarborough and Bridlington), where the current mix needs to be improved. This approach reinforces the core approach of the Plan.

## **Local Policy**

### **Planning Obligations SPD**

The Council has recently produced a draft SPD on Planning Obligations for consultation. This sets out the context regulating the use of planning obligations and offers guidance on issues relevant to their use. The basis for using planning obligations is Section 106 of the 1990 Town and Country Planning Act, Section 46 of the Planning and Compulsory Purchase Act 2004, supplemented by Circular 05/05 'Planning Obligations' and the more recent 'Practice Guidance'. Planning obligations can only be used when they meet the five tests set out by the Secretary of State in Circular 05/05. A planning obligations must be:

- 'Relevant to planning;
- Necessary to make the proposed development acceptable in planning terms
- Directly related to the proposed development
- Fairly and reasonably related in scale and kind to the proposed development;
- and
- Reasonable in all other respects'.

The Planning Obligations SPD is a material consideration in determining planning applications. Therefore to ensure a consistency of approach its contents need to influence the development of this SPD, where relevant.

**Policy UR6** in the RUDP, sets out the Council's approach to using planning obligations.

Policy UR6 states

**“THE COUNCIL WILL IMPOSE CONDITIONS OR SEEK PLANNING OBLIGATIONS WHERE DEVELOPMENT PROPOSALS REQUIRE OR WOULD NOT BE ACCEPTABLE WITHOUT THE PROVISION OF;**

**PHYSICAL INFRASTRUCTURE**

**THE MITIGATION OF ADVERSE ENVIRONMENTAL IMPACTS**

**AND/OR THE ENHANCEMENT OF THE ENVIRONMENT**

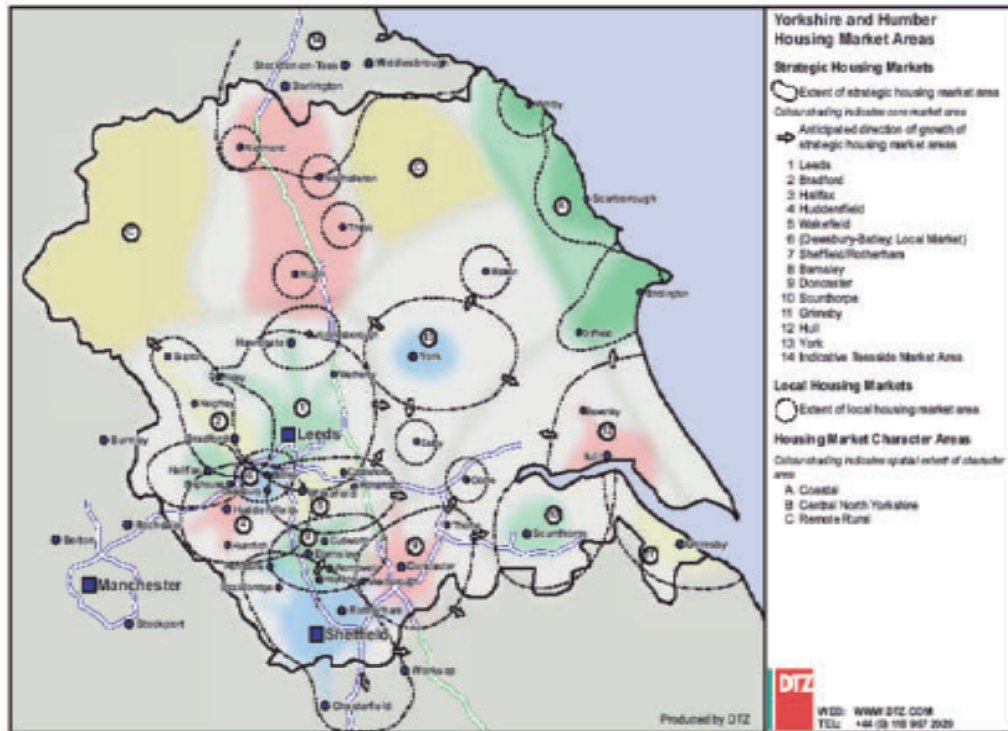
**AND SOCIAL INFRASTRUCTURE”**

#### **Bradford City Centre Affordable Housing Draft SPD**

The draft SPD sets out the Council's affordable housing policy for the City Centre. The SPD elaborates on the replacement RUDP 2005 in relation to all developments in the city centre which require an affordable housing contribution and sets out the policy context, provision and requirements in more detail. The document gives a detailed illustration of the projected need for affordable housing in the City Centre.

## APPENDIX IV

## Draft RSS Yorkshire and Humber Market Areas Map



## Draft RSS Patterns of Affordability Map





## Appendix V

**Local Housing Strategy- Bradford District Affordable Housing Requirement  
Map**