

Local Plan for the Bradford District:

Core Strategy (Publication Draft)

Background Paper: 2. Housing (Part 2)

Housing Mix, Quality and Affordability

February 2014

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## 1. Introduction

- 1.1 This background paper provides more detail on the justification and purpose of policies HO8 Housing Mix, Policy HO9 Housing Quality and Policy HO11 Affordable Housing contained in Chapter 5 Planning for People – Housing of the Core Strategy.
- 1.2 This background paper is structured to demonstrate:
- conformity with national guidance
  - alignment with sub-regional and local strategies of relevance
  - the evidence upon which policy options have been derived
  - a summary of stakeholder input to date
  - policy options and justification.
- 1.3 The policies in this section have been formulated to be consistent with national planning guidance, most notably the National Planning Policy Framework (NPPF) and to reflect the Core Strategy Vision and the following Strategic Objectives of the Plan:
- **SO4.** To provide a range of quality dwellings, in terms of type and affordability, in well designed neighbourhoods to cater for the current needs and future growth of the District.
  - **SO10.** To ensure that Bradford is a diverse city where socially inclusive and vocal communities live and where the needs of citizens are met through improved access to good quality homes, jobs, shopping, cultural facilities, health and education provision and community facilities for a growing population.
  - **SO11.** To provide a clean, safe, secure, sustainable, attractive and accessible built and natural environment in order to reduce the fear of crime and disorder and foster a shared sense of civic pride and responsibility.
  - **SO13.** To reduce the impact of climate change through mitigation and adaptation, particularly through reducing pollution, energy consumption, the risk of flooding, and promoting the use of renewable energy and securing the means to become locally self sufficient
- 1.4 Policies HO8 Housing Mix, HO9 Housing Quality and HO11 Affordable Housing are important in ensuring the Core Strategy delivers sustainable mixed communities. Housing choice is essential in meeting the wider needs of the District. Sustainable mixed communities require a variety of housing in terms of size, type, tenure and price to meet the needs of different households. Access to affordable housing is a major issue in the District. Securing an adequate supply of decent and affordable homes is a priority for the Council. It is also important that new housing is designed to create high quality places where people aspire to live, support strong communities and healthy lifestyles, and responds to the impacts of climate change. Delivering a sufficient supply of high quality housing is critical to supporting economic growth and facilitating a low carbon economy in the District and wider Leeds City Region.
- 1.5 This background paper will set out justification for the housing policies required to facilitate and deliver sustainable mixed communities and ensure

that new housing provides the type and quality of new homes, which will meet the needs and aspirations of the District's existing and future population.

## **2. Policy Context**

2.1 This section sets out the national, sub-regional and local policy context within which Policies HO8, HO9 and HO11 have been developed. Key documents include:

- National Planning Policy Framework
- The Leeds City Region Local Enterprise Partnership Plan 2012
- City of Bradford Metropolitan District Council Corporate Plan 2013-14
- Community Strategy 2011-14 for Bradford District
- Draft Housing and Homeless Strategy for Bradford District 2014 – 2019
- Bradford District's Housing Strategy for the Over 50s 2011 - 2021
- City of Bradford Metropolitan District Council Climate Change Framework

### *National Planning Policy Framework*

2.2 The National Planning Policy Framework (NPPF) sets out the government's planning requirements in regards to delivering a wide choice of high quality homes. To boost significantly the supply of housing, the NPPF requires planning authorities to meet the full, objectively assessed needs for market and affordable housing in the housing market area.

2.3 To deliver a wide choice of high quality homes, widen opportunities for home ownership and create mixed and inclusive communities, the NPPF requires local planning authorities to:

- plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community
- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand
- where there is an identified need for affordable housing, set policies for meeting this need on site; such policies should be sufficiently flexible to take account of changing market conditions over time

2.4 The NPPF attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development. The NPPF states that local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.

2.4 In terms of design the NPPF states that policies should ensure developments:

- will function well and add to the overall quality of the area over their lifetime
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit
- optimise the potential of the site to accommodate development
- respond to local character and history
- create safe and accessible environments

- are visually attractive as a result of good architecture and appropriate landscaping
- 2.5 The NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions. To support the move to a low carbon future, the NPPF requires local planning authorities:
- to plan for new development in locations and ways which reduce greenhouse gas emissions
  - when setting any local requirement for a building's sustainability, do so in a way consistent with the government's zero carbon buildings policy and adopt nationally described standards
- 2.7 The NPPF makes clear that achieving sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Affordable housing requirements should be set out in the Local Plan. To ensure viability, the costs of any requirements likely to be applied to development, such as for affordable housing, should when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 2.8 Planning authorities should assess the likely cumulative impacts on development in their area of all existing and proposed standards, supplementary planning documents and policies that support the development plan. The cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle.

#### *Local Policy Context*

- 2.9 In terms of housing, a major issue is that the District's growing population is increasing the demand for homes but the supply of quality, affordable homes hasn't been growing fast enough. The Community Strategy for the District identifies a short term priority of ensuring that there is sufficient housing supply and quality to meet the District's needs. A strategic aim in the Community Strategy is "to increase in the quality, quantity and affordability of sustainable housing across the District".
- 2.10 This is reflected in the Housing and Homeless Strategy vision that "Everyone in Bradford District should have a place to call home which is suitable for their needs and in which they can thrive." Building sufficient new homes to meet the needs of a growing population, making sure homes support people to stay healthy and independent and ensuring an adequate supply of affordable homes to buy or rent are priority objectives for the District's Housing Strategy. This includes delivering new homes of the right type in the right location.
- 2.11 A key challenge is the increasing number of older people living in the District. The District's Housing Strategy for the Over 50s sets out that the Council needs to cater for this through a growth in the number of homes provided and by ensuring newly built accommodation is of the best quality and meets older people's needs and expectations.

- 2.12 Climate change is also identified as being a major challenge for the District. Population growth is expected to make massive extra demands on resources in the District. In response to this the Council has produced a framework for action which sets out how the District can prepare, adapt and respond to the impacts of climate change. The Climate Change Framework sets an ambitious target of a 40% cut in District-wide carbon emissions by 2020. Reducing carbon emissions from buildings across the District is identified as having a major impact on achieving the 2020 targets.

#### *Summary*

- 2.13 In accordance with national planning policy and the key local issues and priorities identified in the Council's community and housing strategies, policies HO8, HO9 and HO11 in the Core Strategy will seek to ensure that:
- the housing growth planned for in the Core Strategy will deliver a mix and balance of housing, which meets the current and future needs of the district's population (Policy HO8 Housing Mix)
  - all new residential developments are high quality in terms of design and sustainable construction standards, adaptable to meet the needs of the District's diverse population and help reduce the impact of future development on the environment (Policy HO9 Housing Quality)
  - a sufficient supply of good quality affordable housing is delivered to meet the affordable housing needs of the District (Policy HO11 Affordable Housing)

### **3. Evidence**

- 3.1 This section identifies and summarises the key components and findings of the evidence base, which has been used to inform policies HO8, HO9 and HO11. Key evidence base documents include:
- Strategic Housing Market Assessment 2010 and Update 2013
  - Housing Requirements Study and Addendum 2013
  - Affordable Housing Economic Viability Assessment 2010
  - Local Plan Viability Assessment 2013
- 3.2 The NPPF states that planning authorities should have a clear understanding of the housing needs in the District and a Strategic Housing Market Assessment (SHMA) should be prepared to assess full housing needs. The SHMA should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:
- meets household and population projections
  - addresses the need for all types of housing, including affordable housing and the needs of different groups in the community such as families with children, older people, people with disabilities, service families and people wishing to build their own homes
  - caters for housing demand and the scale of housing supply necessary to meet this demand

#### *Strategic Housing Market Assessment 2010 and Update 2013*

- 3.3 In conformity with national planning policy requirements a comprehensive SHMA for the District has been produced for the Council by consultants

ARC4. The SHMA 2010 was produced in conformity to the Department of Communities and Local Government (CLG) Strategic Housing Market Assessment Guidance<sup>1</sup> and provides a robust evidence base for policy development. The SHMA focuses on four core areas: a review of housing markets; an assessment of housing need and affordable requirements; a review of general market requirements and policy recommendations.

- 3.4 The SHMA was updated in 2013 to consider the impact of housing market and wider economic changes and to consider changes in the national planning and housing policy framework. The 2013 SHMA update will ensure that the Core Strategy is underpinned by robust and up-to-date evidence.
- 3.5 The following paragraphs give a brief overview of the main findings from the SHMA and the key housing market drivers, which influence future housing requirements in the district.
- 3.6 The SHMA provides an analysis of the housing market and the key market drivers in the District and these in turn lead to a number of specific groups for which need and demand must be accommodated within the Local Plan. The key housing market drivers identified in the SHMA are demographic, economic and dwelling stock drivers.
- 3.7 Demography is a key driver of the housing market in the Bradford District, both in terms of overall population growth and increasing number of residents in older age groups. The total number of households in the District is predicted to increase and there is expected to be growth across all age cohorts but most noticeably amongst the over 65 age group. The key drivers of natural population growth in the District and the consequent demand for new homes also include the relatively young age structure of the District's population and the growth of the Black and Minority Ethnic (BAME) population.
- 3.8 In terms of economic drivers, despite the economic downturn, the District is expected to see a significant growth in jobs over the Local Plan period. A strategic priority for the Core Strategy is to ensure that the District attracts and retains economically active households. Delivering a range of good quality housing types will help to achieve this.
- 3.9 In terms of dwelling stock, the housing market in the District is generally balanced with some market pressures in particular areas. Key dwelling stock drivers include:
  - a need to better match new provision with household aspirations, with analysis suggesting shortfalls in three and four bedroom properties, detached and semi-detached houses in particular
  - a need to develop housing to support economic growth by providing accommodation for a diverse range of household types and income groups
- 3.10 In summary, there is a need to maintain the delivery of a variety of dwelling types and sizes to ensure that a better balance between demand and supply is achieved across the District. The SHMA also identifies three groups with

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<sup>1</sup> Department for Communities and Local Government (2007). Strategic Housing Market Assessments Practice Guidance Version 2. August 2007.

specific needs which should be catered for in the Council and its partners' plans and programmes. These are families, older people and BAME households.

- 3.11 In terms of housing need, findings from the SHMA indicate that there is a demand for affordable housing across the Bradford District. The latest assessment estimates an overall net annual requirement for approximately 587 new affordable homes. Based on this need the SHMA recommends a District-wide affordable housing target of 20%-25%. The SHMA also provides an analysis of the tenure, type and size requirements for affordable housing. The latest evidence of property type preferences suggests that primarily, delivery of one and two bedroom affordable houses and flats is a priority.

*Housing Requirements Study and Addendum 2013*

- 3.12 One of the key roles of strategic planning is to estimate the future level of new housing required and to set housing requirement target in the Local Plan, which then determine the amount of land needed for new development. An analysis of future households has been carried out as part of the District Housing Requirements Study undertaken by ARUP and Edge Analytics. The analysis considered different scenarios for population change built using POPGROUP software with population forecasts translated into household projections. The study used the most up to date data available at the time, most notably the 2010 based Sub National Population projections and 2008 based Sub National Household Projections, together with projections of the future performance of the local economy taken from the Regional Econometric Model.
- 3.13 An update addendum report was produced to re-run the two core scenarios within the initial report using the data from the Interim 2011 Based Sub National Household Projections issued by the Government in April 2013.
- 3.14 Key conclusions from the Housing Requirements Study and Addendum report include:
- the number of households across Bradford District is expected to increase over the period 2011-2028 by between 29,831 and 42,333 based on the Housing Requirements Study estimates
  - much of this increase will be from the indigenous population and an important underlying driver is the growth of the BAME population
  - the overarching conclusion of the Housing Requirements Study is a recommendation that the council adopts a housing target of around 2,186 dwellings each year

*Affordable Housing Economic Viability Assessment 2010*

- 3.15 To inform the Core Strategy Further Engagement Draft the Council commissioned an Affordable Housing Economic Viability Assessment (AHEVA) to produce recommendations on the viability of the proportion of affordable housing, site thresholds and tenure splits in different locations and on a range of different site types across the District. This was in conformity to the requirements in Planning Policy Statement 3<sup>2</sup> paragraph 29 and preceded the Local Plan Viability Assessment.

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<sup>2</sup> Department for Communities and Local Government (2010). Planning Policy Statement 3: Housing



- 3.16 The AHEVA indicates the likely maximum percentages of affordable housing that could be achieved over the life of the Core Strategy. The assessment found that viability differs greatly across the District. In some areas there is pressure on development viability. These areas are mainly located in inner Bradford and Keighley. The AHEVA tested site size thresholds for affordable housing and found that a threshold of 5 units on sites in higher value areas can produce developable, deliverable sites. In the lower value areas testing showed that the majority of sites below 15 dwellings are not capable of delivering affordable housing.
- 3.17 An important conclusion from the assessment is that given pressures upon development viability in some of the main urban areas, in order to meet the overall District wide affordable housing target, the AHVEA recommends that grant funding and any other forms of subsidy and funding for affordable housing is directed towards development in these locations.

*Local Plan Viability Assessment 2013*

- 3.18 The need for viability testing of the Local Plan has arisen as a result of the new requirements in NPPF. To be deliverable the plan must ensure that development is not subject to such a scale of obligations and policy burdens that its ability to be developed viably is threatened. The NPPF requires planning authorities to assess the likely cumulative impacts on development in their area of all existing and proposed local standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards.
- 3.19 In response to the viability requirements in the NPPF the Council commissioned DTZ to undertake a viability assessment of the Core Strategy commencing with an assessment of the Further Engagement Draft. The evidence assesses and tests the policies contained in the Core Strategy and makes recommendations for areas of policy that should be considered and reviewed to ensure the plan is viable and deliverable.
- 3.20 The Local Plan Viability Assessment identifies Policy HO9 Housing Quality and Policy HO11 Affordable Housing as having a direct impact on development costs. The assessment tested Policy HO9 in regards to sustainable construction standards, Lifetime Home standards, internal space standards and design, and tested Policy HO11 in regards to affordable housing targets.
- 3.21 The assessment identifies that overall sustainable construction standards have the largest financial impact on plan viability (accounting for nearly half of the cumulative impact on site values) and affordable housing targets have the second greatest impact on plan viability (accounting for around 30% of the cumulative impact on site values). It concludes that that even allowing for a significant improvement in market conditions there remain some locations in the District where development is unlikely to be able to withstand the cumulative impact of the policy standards and obligations proposed in the Core Strategy Further Engagement Draft.

- 3.22 The assessment recommended that for the plan to be viable it is necessary to review the policy standards for housing quality and affordable housing as set out in the Further Engagement Draft or ensure that they are introduced on a 'subject to viability' test.
- 3.23 In relation to affordable housing, analysis indicates that with a return to peak market conditions the proposed standards are viable if considered independently of other standards and obligations. However, when combined with other policy standards, the impact is to undermine viability. The locations in which the effects are most pronounced are the lower value areas (i.e. the urban areas of Bradford and Keighley). The assessment recommended that consideration be given to reducing affordable housing requirements, subject to complying with underlying 'affordable housing need'. In relation to housing quality the assessment recommends sustainable construction standards may require review in order to ensure compliance with the requirements of the NPPF.
- 3.24 In summary, the viability assessment concluded that even allowing for a significant improvement in market conditions there remain some locations in the District where development is unlikely to be able to withstand the cumulative impact of the policy standards and obligations proposed in the Core Strategy Further Engagement Draft. Therefore, it recommended considering reducing affordable housing requirements to unlock potential for greater contributions in other areas. The assessment identified as a minimum, the policy wording needs to allow for a "subject to viability test".

#### *Summary*

- 3.25 In relation to the evidence base presented above:
- Policy HO8 Housing Mix and the strategic priorities within it have been informed by the Bradford SHMA (2010 and 2013 Update) and Housing Requirements Study and Addendum 2013
  - Policy HO9 Housing Quality has been informed by the Bradford SHMA (2010 and 2013 Update) and Local Plan Viability Assessment 2013
  - Policy HO11 Affordable Housing has been informed by the Bradford SHMA (2010 and 2013 Update), Affordable Housing Economic Viability Assessment 2010 and Local Plan Viability Assessment 2013

## **4. Policy Development and Justification**

- 4.1 This section provides an overview of how Core Strategy Policies HO8 Housing Mix, Policy HO9 Housing Quality and Policy HO11 Affordable Housing have developed from the Core Strategy Issues and Options Stage (February 2007) through to Core Strategy Further engagement Draft stage (October 2011) to Core Strategy Publication Draft (February 2014).
- 4.2 Throughout the evolution of the Core Strategy, the Council have been committed to the concept of continual engagement and consultation. A summary of the consultation stages to date, and the key matters raised in relation to the housing policies at each of these stages is set out below. The Council has also taken into account the findings of the Sustainability Appraisal (SA) in formulating the policies in the Core Strategy Publication Draft.

## **Core Strategy Issues and Options (2007)**

- 4.3 During the Issues and Options Stage a series of eight Topic Papers were produced which focused on key topic areas to stimulate discussions surrounding the key issues, constraints and opportunities for development within the Bradford District. Housing and design issues and options were covered by Topic Paper No. 3 Meeting the Need for Dwellings in the District and Topic Paper 7: Environment.
- 4.4 The following key questions were posed during the consultation at the Core Strategy Issues and Options stage:

Key Question 3.3: How should the needs of all sections of the community for a decent affordable dwelling be met?

The following options were presented:

- by allocating sites specifically for affordable housing in all parts of the District where there is need
- by lowering the site size threshold where developers are expected to provide affordable housing in areas where there is an acute shortage of affordable housing
- by allocating larger sites, which encourage mixed tenures
- requiring different sites to make provision in relation to a percentage based on the market area and need which promotes a higher requirement in areas of highest need (e.g. Wharfedale)

Key Question 3.4: How can the correct balance of house building and creation of new dwellings in the District in terms of type and size be achieved?

The following options were presented:

- by specifying particular sites for particular type of housing and tenure
- by defining density on a site-by-site basis which will dictate type of development
- by drawing up site briefs for each site
- by asking developers to submit detailed analysis and reasoning on the type and style of development

Key Question 7.4: What should be the overall approach in the Core Strategy to achieving high standards of design for new development?

The following options were presented:

- aim for development that respects and reflects its context and is accessible to all.
- aim for the highest standards of innovation and design for individual buildings with limited reference to context.
- put the emphasis on setting detailed design criteria and only accepting development that meets these standards throughout the District.
- identify distinct areas where particularly high standards of design would need to be met, whether these be Conservation Areas, the City Centre or Neighbourhood Renewal Areas

Key Question 7.5: In framing a strategic policy for sustainable design, which approach should the council favour?

The following options were presented:

- allow developers together with pressure from consumers and national government to determine whether and where higher standards of sustainable design are achieved
- identify circumstances or particular sites in the planning framework, perhaps sites over a certain size, greenfield sites or locations in strong market areas, where higher levels of sustainable design would need to be met
- focus efforts on targeting local areas within which to test the application of particular aspects of sustainable design e.g. requiring green roofs for development on the edges of settlements or sustainable urban drainage schemes for areas where infrastructure is under pressure

4.5 Topic Papers 3 and 7 and Questions 3.3, 3.4, 7.4 and 7.5 above sought to address the following **Initial Sustainability Appraisal** Objectives:

<b>Initial Sustainability Appraisal Objectives (February 2007)</b>	<b>Links to Topic Papers, Key Questions and Options</b>
Provide the opportunity for everyone to live in quality housing which reflects individual needs and preferences and resources	Qu. 3.3 asks how the needs of all sections of the community for a decent affordable dwelling should be met.
	Qu. 3.4 asks how can the correct balance of house building and creation of new dwellings in the Di strict in terms of type and size be achieved.
Ensure the prudent and efficient use of energy and natural resources and the promotion of renewable energy	Qu. 7.5 identifies a number of options for achieving sustainable design in buildings.
Reduce the districts impact on climate change and vulnerability to its effects	Qu. 7.5 identifies a number of options for achieving sustainable design in buildings.
Provide social cohesion, encourage participation and improve the quality of deprived neighbourhoods	Qu. 7.4 asks what the overall approach in the Core Strategy should be to achieving high standards of design for new development.

4.6 The following paragraphs provide a summary of the key issues identified from the representations received on the Core Strategy Issues and Options in relation to how Bradford should plan to meet housing need and deliver sustainable communities.

#### *Housing Mix*

4.7 There was equal support for defining density on a site-by site basis, drawing up site briefs and asking developers to submit detailed analysis and reasoning on the type and style of development.

- 4.8 Further comments stated that the Local Development Framework should not be too prescriptive over house types and tenures and the market should be allowed to decide on the type of housing for any development, which could be justified through the design and access statement submitted with an application. The LDF must plan for balanced communities where new housing developments include a mix of dwelling types and tenures accommodating a range of needs. This includes making special provision of the needs of the elderly by planning for sheltered accommodation in the most sustainable locations. Ten respondents commented that this should be informed by a Strategic Housing Market Assessment (SHMA).

#### *Housing Quality*

- 4.9 The need to aim for development that respects and reflects its context and is accessible to all was supported by the majority of respondents. Support was also given to identifying distinct areas where particularly high standards of design would need to be met. It was supported that high standards of design and innovation also be applied to individual buildings.
- 4.10 There was strong support for sustainable design of buildings from majority of organisations who responded, including the Home Builders Federation (HBF). The majority of respondents favoured focusing efforts on targeting local areas within which to test the application of particular aspects of sustainable design e.g. requiring green roofs for development on the edges of settlements or sustainable urban drainage schemes for areas where infrastructure is under pressure. The HBF's view was that local standards should be based around different levels in nationally set Code for Sustainable Homes.

#### *Affordable Housing*

- 4.11 The majority of respondents favoured a requirement of different sites to make provision in relation to a percentage based on the market area and need which promotes a higher requirement in areas of highest need, however it was commented that this may undermine viability of developments. Also favoured was the approach to lower the site size threshold where developers are expected to provide affordable housing in areas where there is an acute shortage of affordable housing or provision is negotiated on a site by site basis.
- 4.12 It was questioned if there should be a policy on rural exception for sites for affordable housing.

#### **Core Strategy Further Issues and Options (2008)**

- 4.13 The Council undertook further public consultation on the Core Strategy at the Further Issues and Options stage between January and May 2008. The consultation focused on a revised Spatial Vision and Objectives, which presented four spatial options for the location of housing and employment development within the District over the plan period.
- 4.14 Key housing issues raised by representations in relation to the strategic approach set out in the Core Strategy Further Issues and Options included:

- general support for the objective 'to provide a range of quality dwellings in terms of type and affordability, to cater for the current needs and future growth of the District';
- support for meeting locally generated needs for affordable housing in local service centres;
- constraints placed on development sites by planning policies makes sites more expensive and less viable, leading to less housing and fewer affordable properties;
- the need more affordable housing for young couples; single people and elderly;
- support for the vision contributing to the renaissance of the District by building upon the existing character of the District through promoting high quality sustainable design;
- the opinion that new housing developments spoil the landscape;
- steps must be taken to ensure that all new build is of high quality and not repeat the mistakes of the past;
- green/environmental standards should be given urgent and immediate consideration, and that all future development should meet the highest possible standards, including carbon neutral building; and
- need to maintain and improve high levels of sustainability

### **Core Strategy Further Engagement Draft (FED) (2011) - Choosing the Preferred Approach**

- 4.15 The Council in response to national planning policy requirements and the written representations received during the Core Strategy Issues and Options public consultation commissioned a SHMA for the District which was published in 2010. To inform the Core Strategy Further Engagement Draft (FED) the Council also commissioned an Affordable Housing Economic Viability Assessment to produce recommendations on the viability of the proportion of affordable housing, site thresholds and tenure splits in different locations and on a range of different site types across the District.
- 4.16 The Bradford SHMA 2010 and AHEVA 2010 informed the preferred approach (Core Strategy FED, 2011) to housing mix, housing quality and affordable housing.

### **Core Strategy Further Engagement Draft: Policy HO8 Housing Mix**

- 4.17 Policy HO8 Housing Mix in the Core Strategy FED sought to achieve the right balance between maintaining a flexible approach to the future delivery of dwellings, whilst setting out key goals for delivering an appropriate range of housing types to meet the needs of the District's growing population and ensuring that future decisions of plans and strategies are based on the most up to date evidence of need and demand.

### **Sustainability Appraisal**

- 4.18 The **Interim Sustainability Appraisal** of the Core Strategy FED identified Policy HO8 as complementary to the policy on affordable housing and a fundamental policy for the Core Strategy and one which should help to advance the interests of sustainability. Policy HO8 scored positively in regards to significantly supporting Core Strategy SA Objective 8. It also scored positively in regards to marginally supporting SA Objectives 13 and

16. No negative impacts in terms of SA Objectives were identified. The SA identified potential uncertainty with SA Objective 1 however, in respect of its relationship with the promotion of renewable energy.

### **Consultation comments on Core Strategy FED Policy HO8**

- 4.19 The following provides a summary of the written representations made on Policy HO8 during the public consultation period on the Core Strategy FED. Key issues which were identified included:
- the need for larger houses in inner city Bradford;
  - concern that reference to lifetime homes standards is too explicit and its delivery depends on viability as well as the local market needs;
  - the need for sheltered housing, freeing up some houses for younger people;
  - support for Part B of the policy as it provides the flexibility to enable market demand to influence the appropriate type and size of house in a certain location;
  - unclear exactly how and to what degree specific guidance on house types and mix on an area or site basis will be set out in future documents which will allocate sites;
  - support for Part D which emphasises the need to deliver more family housing across the district whilst increasing the supply of larger homes;

### **Core Strategy Further Engagement Draft: Policy HO9 Housing Quality**

- 4.20 Policy HO9 Housing Quality in the Core Strategy FED aimed to ensure that new housing is developed to high standards of sustainable construction, which will be adaptable to meet the needs of the District's diverse population and help reduce the impact of future development on the environment.

### **Sustainability Appraisal**

- 4.21 The **Interim Sustainability Appraisal** of the Core Strategy FED (2011) identified Policy HO9 as an important policy for ensuring that new development is of a standard which meets current good practice, as a minimum (expressed through Building Regulations), in advancing the interests of sustainable development. Policy HO9 scored positively in regards to significantly supporting Core Strategy SA Objectives 1, 3, 8 and 16. It also scored positively in regards to marginally supporting SA Objectives 13. No negative impacts in terms of SA Objectives were identified. The SA identified that The Merton-style 10% renewable targets might be regarded as unpragmatic in the current housing market, and perhaps outdated in light of the rapidly changing policy environment. Regulations could be more reliable to implement and with broadly similar outcomes.

### **Consultation comments on Core Strategy FED (2011) Policy HO9**

- 4.22 The following provides a summary of the written representations made on Policy HO9 during the public consultation period on the Core Strategy FED. Key housing issues identified from representations to Policy HO9 Housing Quality related to the following high level elements:

- sustainable design and construction standards
- decentralised renewable low carbon energy requirements
- Lifetime Homes
- housing quality

4.23 Representations on the aspects of Policy HO9 related to sustainable design and construction standards included:

- general support for Part A of the policy encouraging all new housing developments to meet the highest possible sustainable design and construction standards;
- support for the inclusion of Part B as it provides clarity on expected standards within new development;
- welcome the recognition in the policy of the financial cost of meeting sustainability standards and that the requirement is subject to viability;
- concern that the policy implies that developments should meet high environmental standards and national standards such as the Code for Sustainable Homes. There is a lack of evidence to underpin this and it is not consistent with national planning guidance;
- objections to the inclusion of the Code for Sustainable as the Core Strategy should not refer to something that is dealt with at national level and should only refer to national standards as it is likely to become out of date;
- it will be more appropriate to achieved sustainable standards through building regulations; and
- the requirement for a design stage assessment in Part C of the policy is unjustified.

4.24 Representations relating to decentralised, renewable and low carbon energy requirements in Policy HO9 included:

- objections to this requirement as this will be dealt with through zero carbon housing; and
- support for the recognition that there may be circumstances in an area with a rich historic environment where this may not be possible or practicable

4.25 Representations in relation to Lifetime Homes in Policy HO9 included:

- if the policy goes beyond the requirements of building regulations and national guidance then it should provide flexibility based on viability;
- objections to the Lifetime Homes requirement as it is inconsistent with national policy and is therefore unsound;
- an objection to this requirement as there is no evidence to justify it; and
- imposing this requirement is unrealistic in the current economic climate and will serve to undermine housing delivery and economic growth.

4.26 Representations concerning housing quality in Policy HO9 included:

- an aspect of housing quality that needs to be considered in the policy is the size of dwellings, proposals should have to be of a minimum size and offer amenity for families;



- the plan should do more to improve the look and quality of new housing and development standards;
- concern about the quality of housing to be built and that large construction companies will simply install standard poorly designed houses; and
- the policy should only refer to the latest national policy in relation to housing quality.

### **Core Strategy Further Engagement Draft: Policy HO11 Affordable Housing**

- 4.27 Policy HO11 Affordable Housing in the Core Strategy FED set an overall target for the amount of affordable housing to be provided and the range of circumstances in which affordable housing will be required.

### **Sustainability Appraisal**

- 4.28 The **Interim Sustainability Appraisal** of the Core Strategy FED (2011) identified that Policy HO11 is a fundamental policy for positive planning in the District. Its positive character should help to ensure that there is progress toward ensuring that the issue remains at the forefront of planning practice, although careful monitoring of its effectiveness will be required.
- 4.29 Policy HO11 scored positively in regards to significantly supporting Core Strategy SA Objectives 8 and 13. It also scored positively in regards to marginally supporting SA Objectives 4, 6, 11 and 16. No negative impacts in terms of SA Objectives were identified.

### **Consultation comments on Core Strategy FED (2011) Policy HO11**

- 4.30 The following provides a summary of the written representations made on Policy HO11 during the public consultation period on the Core Strategy FED. Key housing issues identified from representations to Policy HO11 Affordable Housing related to the following high level elements:
- affordable housing targets
  - affordability
  - viability
  - housing Need
- 4.31 Representations on the aspects of Policy HO11 related to affordable housing targets included:
- objection to the 30% affordable housing requirement; a 30% requirement would create too many schemes needing to consider viability appraisals
  - questions over the percentage target for Wharfedale when the need is from Bradford and Keighley
  - affordable housing should be built near where employment will be
  - Part G of the policy relating to tenure mix should be applied flexibly
  - Policy HO11 should include reference to role of off-site contributions to affordable housing

- 4.32 Representations relating to viability in Policy HO11 included:

- general support for affordable targets being subject to viability
- the economic viability of affordable housing provision will vary greatly across the district and the requirements for affordable housing must be assessed on a case by case basis

4.32 Representations in relation to affordability in Policy HO11 included:

- given the diversity of the Bradford area, what constitutes affordable housing in one district does not necessarily compare with affordable housing in another district; and
- commuting costs should be taken into account of in regards to the location of affordable housing

4.34 Representations concerning housing need in Policy HO11 included:

- affordable housing is far more likely to be taken up on brownfield sites close to Bradford;
- support for limited development of affordable houses for local people;
- affordable housing should be built where the need is; and
- a lack of affordable housing does not justify building new development

## **5. Policy Justification: Policy HO8 Housing Mix**

5.1 This section sets out the justification for Policy HO8 Housing Mix in the Core Strategy Publication Draft. The publication of the NPPF, written representations and further evidence base work in the form of the SHMA Update 2013 and Local Plan Viability Assessment informed the policy. Policy HO8 as proposed in the Core Strategy Publication Draft is set out below.

### **Policy HO8 - Housing Mix**

- A. The council, will ensure that a mix and balance of housing is provided to meet the needs of the district's growing and diverse population.**
- B. All large sites will be expected to incorporate a mix of housing types, sizes, prices and tenures. The exact mix should be based both on market demand and evidence of local need within the district's SHMA together with any other robust local evidence or information. The location and nature of the site and its surroundings and the profile of the existing stock in the area should also be considered.**
- C. Specific guidance on housing mix on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans.**
- D. Within the district there will be a need for all types and sizes of housing but there should be a particular emphasis of the following strategic priorities:**
- 1. Delivering more family housing across the district**
  - 2. Delivering sufficient affordable housing in accordance with Policy HO11 and meeting the needs of people on lower incomes and first time buyers**

3. Increasing the supply of larger homes across the district, particularly in areas suffering from high levels of overcrowding
4. Increasing the supply of accessible housing which is able to meet people's needs throughout their lives
5. Increasing the supply of high quality flats, particularly in city and town centres and accessible locations
6. Supporting the provision of specialist accommodation for older people in suitable locations and in areas of greatest demand

#### Overall Aim of the Policy

- 5.2 Policy HO8 will ensure that new residential development provides for a range of housing types to help support the creation of mixed, balanced and inclusive communities. The policy will support Core Strategy Strategic Objectives SO4, SO10 and SO11.

#### Policy Justification: HO8 - Housing Mix

- 5.3 To deliver a wide choice of high quality homes and create sustainable, inclusive and mixed communities the Core Strategy, through the inclusion of Policy HO8 Housing Mix, will plan for a mix of housing based on demographic and market trends and the needs of different groups in the District.
- 5.4 **Criteria A** will help ensure that the increase in housing identified in the Core Strategy will deliver a mix and balance of housing, which meets the future needs of the District's population. New developments will be expected to take account of housing need and demand and justify the proposed housing mix by demonstrating how the development will contribute to meeting the housing needs and strategic priorities of the District as set out in Policy HO8.
- 5.5 **Criteria B** will promote mixed communities and successful places by ensuring that larger housing sites achieve a good mix of housing, which reflects the requirements of specific groups throughout the District. The policy recognises that it will not always be possible for smaller sites to achieve a mix of house types. However, larger sites of 0.4ha or 10 dwellings or more will be expected to deliver a mix of house types and sizes consistent with evidence of need and demand in the area and the particular characteristics of the site. This will support Policy HO9 Housing Quality by ensuring developments provide a mix of housing types and tenures that meet local requirements and needs. As the Core Strategy is a strategic document, Policy HO8 is not unduly prescriptive and does not specify percentages of different house types across the District. However, **Criterion C** allows for more detailed guidance on housing mix on an area or site basis to be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAP's and Neighbourhood Plans. This is in conformity with the NPPF requirement to identify the size, type, tenure and range of housing that is required in particular locations.
- 5.6 Policy HO8 does not specify percentages of different house types across the District; however it is considered that there is a clear role for the Core Strategy to set out the strategic issues in terms of the mix of housing needed over the plan period. This does not mean being too prescriptive and allows the circumstances of individual sites to be taken into account. It is also clear that, particularly on large sites, developers must attempt to provide for a mix of house types if the aspirations to provide both housing choice and achieve mixed and sustainable communities are to be realised. This approach to

achieving housing mix has been generally supported throughout the Core Strategy production stages.

- 5.7 **Criterion D** identifies the strategic housing priorities required to help address particular housing pressures and the requirements of specific groups in the District. The strategic priorities have been informed by the SHMA. The SHMA provides an analysis of the key housing market drivers in the District which lead to a number of specific groups for which need and demand must be accommodated within the Local Plan. The SHMA identifies three groups with specific needs which should be catered for in the council's plans. These are families, older people and the Black and Minority Ethnic (BAME) households.
- 5.8 Families account for around 30% of households across the District. Given the likely level of population and household growth driven by natural change the current demand for core family housing products such as detached and semi detached houses with sizes ranging from two to four bedrooms, will be exacerbated if there is not a strong focus in future supply on family housing. Therefore delivering more family housing is identified as a strategic priority.
- 5.9 The level of increase in older people means that the Council is faced with a major strategic challenge of ensuring that there is a range of appropriate housing provision for this part of the population in the future. The Council has recently produced a District Housing Strategy for the Over 50's 'Great Places to Grow Old'. This estimates that the District needs at least a 31% growth in provision of specialist accommodation over the next 20 years simply to keep up with the growth in population. This challenge is reflected in **Criteria D** with the inclusion of Strategic Priority 6 'Supporting the provision of specialist accommodation for older people'.
- 5.10 It is not considered appropriate within the Core Strategy to specify exactly where in the District more provision of specialist housing is needed. Changing demographics, ongoing new provision and the decommissioning of outdated provision will provide a constantly changing picture that a static analysis of the District would not suit. Therefore **Criteria D** includes a flexible policy for supporting specialist older people's accommodation in suitable locations and in areas of greatest demand.
- 5.11 The challenge of ensuring appropriate housing provision for older people needs to be tackled in two ways. Firstly by provision of a broad range of specialist forms of accommodation, such as sheltered and extra care housing, and secondly by ensuring that the design of general market housing allows for people to remain in their homes for as long as they wish to and are able to. A key action from 'Great Places to Grow Old' is to ensure that newly built accommodation is of the best quality and meets people's needs and expectations.
- 5.12 **Criteria D** seeks to support this action through Strategic Priority 4 by increasing the supply of accessible housing which is able to meet people's needs throughout their lives. The specific reference to Lifetime Homes has been removed from **Criteria D** to allow greater flexibility for how accessible homes will be delivered and to reflect the latest government position in relation to housing standards. However given the strategic challenges identified above, larger sites will be expected to include a proportion of accessible homes as part of the overall housing mix and should consider the provision of specialist housing for older people and people with disabilities.

- 5.13 There is considerable ethnic diversity within Bradford. The SHMA identifies that BAME population growth will be an important housing market driver. The SHMA identifies the proportion of BAME households is greatest in the City Central sub area. Overcrowding is a major issue in this sub area and is linked to the size of BAME households and reflects the need for larger properties. This is reflected in Strategic Priority 3 identified in **Criteria D**.
- 5.14 Access to affordable housing is a major issue in the District. Findings from the SHMA indicate that there is a demand for affordable housing across the District. A strategic priority in **Criteria D** is to deliver sufficient affordable housing in accordance with Policy HO11 and meeting the needs of people on lower incomes and first time buyers.
- 5.15 The SHMA suggests a demand for flats, particularly in the Bradford City and Bingley and Shipley sub areas. Although the current market demand for flats appears to be relatively low, in the long term the delivery of high quality flats in appropriate accessible locations will be important in meeting the challenges of Bradford's growing population and its regeneration ambitions. Providing higher density housing and flats in sustainable locations, such as the city and town centres, will help ensure housing growth is delivered in the most sustainable way and provide opportunities for city and town centre living to support the vitality and viability of the District's centres.

### **Sustainability Appraisal**

- 5.16 The **Sustainability Appraisal** of the Core Strategy Publication Draft (February 2014) concludes that Policy HO8 has significant positive impacts in relation to housing and SA Objective 8. The SA identifies that the policy will help provide the right mix of housing to meet the diverse needs of the district's population, and will help deliver 3 and 4 bedroom homes which previously have been identified in the SHMA as needed in Bradford. Supporting the provision of specialist accommodation for older people will also help to meet an important need in Bradford. The SA identifies there are minor positive impacts socially since meeting housing need will help to provide social cohesion, as will attempts to relieve overcrowding through provision of larger homes in areas suffering from high levels of overcrowding.
- 5.17 The SA also notes that the policy is in accordance with the NPPF requirements since it will help to deliver a wide choice of high quality homes and fulfils the needs for Local Planning Authorities to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.

### **Summary**

- 5.18 It is considered that Policy HO8 Housing Mix is fully justified and achieves the right balance between maintaining a flexible approach to the future delivery of dwellings, whilst setting out mechanisms and strategic priorities for delivering an appropriate range of housing types which meet the needs of the District's growing population.
- 5.19 In conclusion it is considered Policy HO8 is in full compliance with NPPF paragraphs 47-50 and has been informed by the most up to date evidence in the Bradford SHMA 2010 and Update 2013 and Housing Requirements Study

and Addendum 2013. This is in conformity with NPPF housing evidence requirements set out in paragraph 159.

## **6. Policy Justification: Policy HO9 Housing Quality**

- 6.1 This section sets out the justification for Policy HO9 Housing Quality in the Core Strategy Publication Draft. The publication of the NPPF, written representations and further evidence base work in the form of the SHMA Update 2013 and Local Plan Viability Assessment 2013 have informed the policy. Policy HO9 as proposed in the Core Strategy Publication Draft is set out below.

### **Policy HO9 – Housing Quality**

- A. New housing development should be high quality and achieve good design.**
- B. The Council will encourage all new housing developments to meet the highest possible sustainable design and construction standards. Subject to feasibility and / or viability, the minimum acceptable standards with reference to the Code for Sustainable Homes or any national equivalent will be:**
- Code Level 4 from the date of adoption, and
  - Zero Carbon Housing from 1<sup>st</sup> April 2016
- C. New homes should be designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including people with disabilities.**
- D. New development should provide private outdoor space for homes, unless site constraints make this clearly unfeasible and/or unviable.**
- E. New homes should be well laid out internally and should provide suitable space standards appropriate to the type of home. Rooms should receive adequate levels of daylight.**
- F. New development should provide adequate storage for bins, recycling and cycles. These should be located or designed in a way which is both convenient for residents and supports the quality of the street scene.**
- G. Specific guidance on housing quality and design on an area or site basis will be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans. Higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so.**

### **Overall Aim of the Policy**

- 6.2 In accordance with the Council's priority of increasing the quantity and quality of housing in the District, Policy HO9 will aim to ensure that new housing is developed to high standards of sustainable design and construction, which

will be adaptable to meet the needs of the District's diverse population and help reduce the impact of future development on the environment. The policy will support the Core Strategy Strategic Objectives SO4, SO10, SO11 and So13.

### **Policy Justification: HO9 Housing Quality**

- 6.3 Good design is a key aspect of sustainable development. The Core Strategy seeks to achieve high quality and inclusive design and a good standard of amenity for all. Throughout the Core Strategy production stages there has been support for the Core Strategy seeking to secure high quality design for new housing developments. Representations received in relation to the Core Strategy Further Engagement Draft, raised concern in relation to the quality of future housing to be delivered and that the plan should do more to improve the look and quality of new housing. Policy HO9 identifies the quality of housing required to help address the District's strategic housing market challenges and priorities. It complements the general design policies of the Core Strategy publication draft including Policies SC9 and Ds1 to DS5.
- 6.4 The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development. Local plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area.
- 6.5 **Criteria A** will help ensure that new housing is high quality and achieves good design and sets out how the quality of good design will be assessed. For schemes over 10 units this will be determined through a Building for Life 12 Assessment (or any subsequent revised national standard). In order to be considered good a scheme should achieve as many 'greens' as possible. This will enable the Council, developers and the public to see if a housing development achieves good design and therefore constitutes sustainable development.
- 6.6 Building for Life is the industry standard endorsed by government for well-designed homes and neighbourhoods. An updated version Building for Life 12 was launched in September 2012. This reflects the vision for housing developments of attractive, functional and sustainable places to live. The updated version of Building for Life 12 is based upon the NPPF requirements for good design and the government's commitment to build more homes, better homes and involve local communities in planning.
- 6.7 The Council is committed to producing a Housing Design Guide as a Supplementary Planning Document (SPD). **Criteria A** will provide a strong policy justification for the production of this SPD. The Housing Design Guide will set out further guidance on how the requirements of Policy HO9 should be met and will provide guidance on how good design and sustainable development for housing schemes can be achieved.
- 6.8 Mitigating and adapting to the impacts of climate change are key challenges for the District. To support the Council's carbon reduction targets and help deliver schemes that achieve high levels of sustainability and exceed minimum standards, **Criteria B** sets out the local sustainable requirements for new housing and encourages all new housing developments to meet the highest possible sustainable design and construction standards.

- 6.9 The sustainable construction standards in Policy HO9 have been reviewed since the Core Strategy FED to reflect the requirements of the NPPF in relation to local sustainability standards and viability and in response to representations received. Subject to viability and/or feasibility **Criteria B** requires Code Level 4 from the date of adoption and Zero Carbon Housing from 1<sup>st</sup> April 2016.
- 6.10 In relation to the inclusion of local sustainability standards the NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions and requires planning authorities to plan for new development in locations and ways which reduce greenhouse gas emissions. The need to mitigate the impacts of climate change, the District's challenging carbon reduction target and large population growth mean the Core Strategy should seek to ensure that new housing is developed to high standards of sustainable construction. It is therefore considered that setting a local requirement for sustainable housing that exceeds national standards in Policy HO9 is justified.
- 6.11 The NPPF requires any local sustainability requirements to be consistent with the government's zero carbon buildings policy and adopt nationally described standards. **Criteria B** refers to standards expressed by parts of the Code for Sustainable Homes, Zero Carbon Homes or any national equivalent. The Code for Sustainable Homes is a nationally described standard, as referred to in the NPPF, and is therefore considered a legitimate local standard to use. The code currently can only be enforced when included as a requirement in planning policy
- 6.12 The Code for Sustainable Homes aims to reduce carbon emissions and promote higher standards of sustainable design above the current minimum standards set out by the Building Regulations. The Code for Sustainable Homes covers nine categories of sustainable design:
- Energy and CO2 Emissions
  - Water
  - Materials
  - Surface Water Run-off
  - Waste
  - Pollution
  - Health and Well-being
  - Management
  - Ecology
- 6.13 The cost implications of achieving high sustainable construction standards of are recognised and have been reflected in the policy. The Local Plan Viability Assessment testing indicates that a requirement for Code Level 6 is unlikely to be viable by 2016 in most areas of the District. The requirement for Code Level 6 by 2016 contained in the FED version, has therefore been removed from Policy HO9. The viability assessment indicates that requiring Code Level 4 has an impact in terms of uplift in build costs but is viable in the majority of the District when tested against higher value sensitivities. It is considered that requiring Code Level 4 subject to viability is justified given the results of the viability assessment. Requiring Code Level 4 will also help ensure sustainable design principles are achieved in new housing development, in accordance with Council priorities.



- 6.14 Code Level 4 is proposed to only apply to major development in the District (10 dwellings or more) due to viability and deliverability issues, as the additional costs of attaining improved sustainable construction outcomes are often best met by economies of scale. Larger developments can more easily meet the additional costs of attaining improved sustainable construction outcomes through economies of scale. Smaller developments are also more sensitive to variations in costs and values than larger sites. Smaller scale developments will still be encouraged to achieve the highest possible standards of sustainable design and construction.
- 6.15 The government is committed to implementing zero carbon homes from 2016. The Zero Carbon Homes Standard has been included in Policy HO9, to reflect the NPPF requirement to set local requirements for sustainability in a way consistent with the government's zero carbon buildings policy. The standard will apply to energy and Co2 emissions for all new dwellings from 2016. From 2016 major housing schemes will be expected to achieve the zero carbon standards in relation to energy and Co2 emissions and achieve Code level 4 across the 9 categories of sustainable design as set out in the Code for Sustainable Homes (or any national equivalent).
- 6.16 It is considered that **Criteria B** achieves an appropriate balance of setting a local sustainability standard that supports climate change mitigation and the Council's carbon reduction targets, while taking into account economic viability and deliverability. It is recognised that there maybe circumstances, where the standard required cannot be achieved. Therefore, the policy requirement is subject to viability and/or feasibility to ensure that it does not harm the future delivery of housing in the Local Plan.
- 6.17 The 10% requirement of energy from decentralised and renewable or low carbon sources, included in the FED, has been removed from Policy HO9 as a result of changing policy in regards to housing standards and zero carbon housing (which will include 'allowable solutions'). The Sustainability Appraisal also identified that the 10% renewable target might be regarded as unpragmatic in the current housing market, and potentially outdated in light of the rapidly changing policy environment. The decision was therefore taken to remove this requirement from Policy HO9 as it will be addressed through the Code for Sustainable Homes/Zero Carbon housing criteria of the policy and will be consistent with the Government's zero carbon buildings policy and the NPPF requirement to adopt nationally described standards.
- 6.18 The NPPF states that it is important to plan positively for the achievement of high quality and inclusive design for all development and requires planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community including families with children, older people and people with disabilities. The SHMA identifies families and older people as groups with specific needs which should be catered for in the Council's plans. Addressing the requirements of a growing and ageing population and responding to their needs effectively is identified as a strategic challenge in the SHMA and the Council's Housing Strategy for the Over 50's. This strategy seeks to ensure that new housing is built to meet the needs of an ageing population.
- 6.19 The scale of housing growth being planned for in the District offers a real opportunity to ensure future housing is sustainable and meets identified

needs. The challenges and demographic trends identified above mean that the Core Strategy needs to ensure new housing addresses the needs of the District, including families and an ageing population. Therefore, **Criteria C** includes the requirement that new homes should be accessible and easily adaptable to support changing needs over a lifetime.

- 6.20 It is recognised there are different approaches to ensuring that new homes are accessible and adaptable. The government's review of housing standards may also set a new national accessible homes standard. Therefore, to allow greater flexibility the requirement for all housing to be developed to Lifetime Homes Standards, included in the FED, has been removed from Policy HO9. However, given the demographic trends outlined above, **Criteria C** will require all new homes to be accessible and easily adaptable and the Council will encourage new housing to achieve the Lifetime Homes Standard (or any subsequent revised national standard) where feasible and viable. Larger sites of 10 dwellings or more will be expected to include a proportion of accessible homes as part of the overall housing mix. This will be assessed through evidence provided by the applicant that a proportion of homes achieve Lifetime Homes standards, the British Standards for Accessible Housing or any subsequent revised national accessible housing standard. It is considered that this approach allows greater flexibility in delivering accessible and adaptable housing and allows site specific issues and viability to be taken into account. This will also ensure the policy does not undermine housing delivery.
- 6.21 It is considered that **Criteria C** achieves the appropriate balance between meeting the needs of families, older people and people with disabilities and taking into account economic viability and deliverability. The Lifetime Homes standard is still supported and encouraged but it is recognised that greater flexibility is required in the policy as this standard may not always be feasible, desirable or viable and there maybe other more appropriate standards or means of achieving the policy outcome.
- 6.22 The NPPF states planning should seek to secure high quality design and a good standard of amenity for all occupants of land and buildings. The SHMA identifies families, older people and BME households as having particular housing requirements in the District. To help meet the housing requirements of the District **Criteria D** will seek to ensure all new housing provides private outdoor space for homes, unless this is clearly unfeasible or unviable.
- 6.23 The quality of the home can have an impact on health and wellbeing. Private outdoor space is important for all age groups and is particularly important for families and older people<sup>3</sup>. Providing an adequate and suitable outdoor space in which residents can relax and play in relative privacy and safety can help improve quality of life and wellbeing.
- 6.24 **Criteria D** will aim to meet the housing requirements of key groups in the District and improve health and wellbeing by requiring private outdoor space where feasible and viable, while allowing flexibility as to how this is delivered. It is not considered appropriate to set standards for private outdoor space as there maybe occasions where this is not feasible or viable and the amount

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<sup>3</sup> Ipsos MORI and RIBA (2012). The way we live now: What people need and expect from their homes. A research report for the Royal Institute of British Architects

and type of private outdoor space will be different on a site by site basis. The policy is also subject to feasibility and viability to allow flexibility and ensure that it does not undermine housing delivery. The Housing Design SPD will provide further guidance on the provision and design of private outdoor space.

- 6.25 **Criteria E** will seek to ensure all new housing in the District is well laid out internally and provides suitable space standards. **Criteria E** will aim to meet the housing requirements of key groups in the district, address overcrowding and improve health and wellbeing by requiring minimum space standards where feasible and viable
- 6.26 **Criteria E** has been included in light of the publication of the NPPF, which states that planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community and identify the size of housing that is required in particular locations reflecting local demand and in response to Core Strategy representations. Representations received in relation to Policy HO9 (as set out in the Core Strategy FED), included that an aspect of housing quality that needs to be considered in Policy HO9 is the size of dwellings and that proposals should have to be of a minimum size and offer amenity for families. It was also stated that the plan should do more to improve the look and quality of new housing. Opposing views were also expressed that Policy HO9 should only refer to the latest national policy in relation to housing quality.
- 6.27 Good design is a key aspect of sustainable development and the NPPF states that Local Plans should develop comprehensive policies that set out the quality of development that will be expected. The provision of sufficient living space within new homes is an important element of good housing design. Residents of new homes should be provided with sufficient space for basic daily activities and needs. A lack of adequate space for households has been shown to have significant impacts on health, educational attainment and wellbeing<sup>4</sup>. If homes are to be sustainable in the long term, they must offer functional and adaptable spaces that meet the needs of households in the district including families with children, BME households, older people and residents with disabilities.
- 6.28 The Royal Institute of British Architects (RIBA) have identified that new homes in the UK not only appeared to be shrinking, but are also some of the smallest in Western Europe<sup>5</sup>. To address this issue, new minimum space standards based on daily activities and the space needed for them have been introduced by the Greater London Authority<sup>6</sup>. These standards were based on guidance about how much space is needed in the average household for basic furnishing and activities. They apply to both publicly and privately financed homes and are intended to ensure that new homes are comfortable and functional. RIBA consider that the London space standards provide the best available benchmark from which to assess whether a home is big enough<sup>7</sup>. Other planning authorities outside of London have also included

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<sup>4</sup> RIBA (2011). The Case for Space. The size of England's New Homes.

<sup>5</sup> RIBA. (2011).The Case for Space. The size of England's New Homes.

<sup>6</sup> GLA (2011). The London Plan Spatial Development Strategy for Greater London.

<sup>7</sup> RIBA (2011) The Case for Space. The size of England's New Homes

policies on minimum space standards for new housing within their Core Strategies.

- 6.29 The scale of housing growth being planned for in the District offers a real opportunity to ensure future housing is sustainable and meets identified needs. The challenges and demographic trends identified above mean that the Core Strategy needs to ensure new housing addresses the needs of families, BME households and older people in particular. Therefore, the inclusion of **Criteria E** requiring suitable space standards is considered justified. Including a policy on suitable space standards in the Core Strategy will ensure new homes provide sufficient space for everyday activities and help address the needs of households. Homes can also be used more flexibly and adapted more easily to changing life circumstances.
- 6.29 In considering what suitable space standards to apply, the cost implications of achieving space standards on financial viability have been tested. The Local Plan Viability Assessment tested the impact of applying English Partnerships space standards (2007) to new development. The results indicate an improvement in viability on the base appraisals when these space standards are applied. However, the assessment urges caution in this regard as house builders can achieve cost efficiencies in the delivery of standard house types, which may not correspond to specific space requirements if prescribed in policy.
- 6.30 Overall, it is considered that the standards tested provide an appropriate basis for setting minimum internal space standards. These standards were developed and reviewed in 2007 to ensure they were challenging but also viable and adjusted to the market<sup>8</sup>. The standards are also broadly equivalent to the standards set out in the London Plan, which RIBA consider the best benchmark available for assessing if a home is large enough. The impact of the recession and economic downturn on the housing market since 2007 are recognised. However, it is considered that if these standards were considered to be the minimum acceptable standards to ensure homes are flexible, adaptable and fit for purpose in 2007 then they are still relevant in today's context.
- 6.31 It is recognised these standards may not always be feasible or viable. The government review of housing standards may also set new national internal space standards for new housing. Therefore, specific space standards are not set out in the policy but are included in the implementation text. This is to ensure that the Core Strategy policy does not become out of date if revised national standards are introduced, and to allow greater flexibility in meeting the requirement of **Criteria E**.
- 6.32 **Criteria E** will require new housing to be well laid out and built to suitable space standards. To achieve this new housing will be expected to meet the identified minimum standards, where feasible and viable. If these minimum standards are not met, this will need to be clearly justified and the applicant will need to demonstrate how the development meets the requirements of **Criterion E**. This approach allows greater flexibility in delivering housing to suitable space standards and allows site specific issues and viability to be taken into account. This will ensure the policy does not undermine housing delivery. The Housing Design Guide SPD will provide further guidance on

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<sup>8</sup>English Partnerships (2007) Quality Standards. Revised from November 2007  
Core Strategy Publication Draft (2014)  
Background Paper 2: Housing (Part 1)

how homes can be well laid out internally, which will help applicants make successful applications, in accordance with the NPPF.

- 6.33 **Criteria F** aims support the District's carbon reduction and recycling targets, and improve health and wellbeing by requiring new development to provide adequate storage for bins, recycling and cycles. **Criteria F** has been included in light of the publication of the NPPF, which seeks to secure high quality design and a good standard of amenity for all occupants of land and buildings.
- 6.34 In relation to waste the NPPF states that planning should contribute to minimising waste as a key element of sustainable development. In terms of design, the NPPF states policies should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- 6.35 Recycling and composting rates in the District represent around 25% of total household waste generated. Significant improvements are needed to meet the minimum target of 220,331 tonnes arising of municipal solid waste (MSW) to be recycled (64% of the forecast total MSW arising)<sup>9</sup>. To support Policies EN13 and EN14 of the Core Strategy and the objectives of the emerging Waste Management Development Plan the principles of sustainable design must be taken into consideration for all new development. Making space for domestic waste storage and the separation of materials for recycling is an important part of the design of new homes. The provision of appropriate storage and separation facilities in new housing developments can help to minimise the amount of waste sent to landfill and manage waste in accordance with the waste hierarchy.
- 6.36 With regard to cycling, the NPPF states that plans should ensure developments that generate significant movement maximise sustainable transport modes and manage patterns of growth to make the fullest possible use of cycling. The NPPF encourages sustainable transport solutions, which support reductions in greenhouse gas emissions and reduce congestion. Cycling is a sustainable mode of transport which can play an important role in facilitating sustainable development and also in contributing to wider sustainability and health objectives.
- 6.37 The District has ambitious aims to increase participation in and enjoyment of all forms of cycling year-on-year<sup>10</sup>. It is important that the District's cycling infrastructure enables and encourages people to cycle for health, leisure and as a form of low carbon transport by directly addressing their needs. The District's cycling strategy seeks to encourage the creation of cycling facilities and to promote cycling throughout the Bradford District. Ensuring that cycle facilities and infrastructure improvements are considered as part of all new major developments is identified as a priority action in supporting these aims.
- 6.38 Predicted population growth is expected to make extra demands on resources in the district. The District's challenging recycling and carbon reduction targets and large population growth mean the Local Plan should seek to ensure that new housing provides adequate storage for bins,

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<sup>9</sup> City of Bradford MDC (2011). Waste Management DPD Preferred Approach.

<sup>10</sup> City of Bradford MDC (2012) Setting the wheels in motion! A Cycling Strategy for Bradford 2012-2020

recycling and cycles. To ensure high quality inclusive design **Criteria F** requires these to be located or designed in a way which is both convenient for residents and supports the quality of the street scene.

- 6.39 The NPPF states that local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. **Criteria G** sets the policy context for specific guidance on housing quality and design on an area or site basis to be set out as necessary in the Allocations DPD, Bradford City Centre and Shipley & Canal Road AAPs and Neighbourhood Plans. The nature of some sites and areas in terms of their location, viability and impact upon the environment, mean that higher standards of sustainable design and construction standards may be possible. Therefore, higher standards of sustainable design and construction may be required for certain sites or areas where it is feasible and viable to do so. The reference to the Shipley & Canal Road Area Action Plan delivering housing within the Urban Eco Settlement area which meets Eco Towns standards as defined in the supplement to PPS1 has been removed from Policy HO9 as this is covered in Sub Area Policy BD1.

### **Sustainability Appraisal**

- 6.40 The **Sustainability Appraisal** of the Core Strategy Publication Draft (2014) concludes that Policy HO9 has significant positive impacts in relation to SA Objectives 1, 2, 3 and 8. The SA identifies Policy HO9 has positive impacts on several environmental objectives since it will help ensure good design of new housing, achieve zero carbon homes by 2016 and encourage recycling. There are also positive impacts in regards to social objectives since high quality housing will help the population of the district have good access to housing and will encourage social cohesion.
- 6.41 The SA also notes that Policy HO9 is in accordance with the NPPF requirements since it seeks to deliver a wide range of high quality housing across the district. The policy will also contribute to high quality design and a good standard of amenity for all users of land and buildings.

### **Summary**

- 6.43 It is considered that Policy HO9 Housing Quality is fully justified and will help ensure that housing developments in the district are of high quality and contribute to inclusive built environments, support the Council's carbon reduction targets and help deliver high quality housing which meets the requirements of the District.
- 6.44 In conclusion it is considered Policy HO9 is in full compliance with NPPF paragraphs 47-50, 56-66 and 93-97 and has been informed by the most up to date evidence in the Bradford SHMA 2010 and Update 2013 and Local Plan Viability Assessment. This is in conformity with NPPF housing evidence requirements set out in paragraph 159 and the viability and deliverability requirements in paragraphs 173-174.

## **7. Policy Development and Justification: Policy HO11 Affordable Housing**

### **Core Strategy Publication Draft (February 2014)**

- 7.1 This section sets out the justification for Policy HO11 Affordable Housing in the Core Strategy Publication Draft. The publication of the NPPF, written representations and further evidence base work in the form of the SHMA Update 2013 and Local Plan Viability Assessment have informed the policy. Policy HO11 Affordable Housing as proposed in the Core Strategy Publication Draft is set out below.

#### **Policy HO11 Affordable Housing**

- A. The council will work with partners to ensure that there is a sufficient supply of good quality affordable housing distributed throughout the district, particularly in the areas of highest need.**
- B. Subject to viability, the council will negotiate for up to the following proportions of affordable housing on residential developments:**
- Up to 30% in Wharfedale
  - Up to 20% in towns, suburbs and villages
  - Up to 15% in inner Bradford and Keighley

**Affordable housing should be provided on-site and be indistinguishable from and well integrated with market housing, unless off-site provision or a financial contribution can be robustly justified and would support the creation of inclusive and mixed communities.**

- C. Affordable housing will be required on sites of 15 dwellings or more and on sites over 0.4 hectares in size. The site size threshold is lowered to 5 dwellings in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley.**
- D. The council will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure having regard to robust evidence of local need, site suitability and viability.**
- E. Where an applicant can provide robust, up to date and verifiable evidence to support the view that a site would be unviable if affordable housing targets are required then the exact amount of affordable housing, or financial contribution to be delivered, will be determined by economic viability having regard to individual site and market conditions.**

#### **Rural Affordable Housing**

- F. Consideration will be given to allocating rural exception sites within specific rural settlements in the Allocations DPD and in Neighbourhood Plans where sufficient affordable sites to meet local need cannot otherwise be delivered.**

**G. The criteria for assessing speculative proposals for rural exceptions via planning applications will be set out in the Allocations DPD and will give priority to protecting the most sensitive sites and those areas of land where development would significantly undermine the openness of the green belt.**

### **Overall Aim of the Policy**

- 7.2 Policy HO11 will aim to ensure that a sufficient supply of good quality affordable housing is delivered to meet the affordable housing needs of the District. The policy will support the Core Strategy Strategic Objectives SO2, SO4 and SO10. :

### **Policy Justification: HO11 Affordable Housing**

- 7.3 Access to affordable housing is a major issue in the District. Strategic aims for the Council are to ensure an adequate supply of affordable homes to buy or rent that match household incomes, build sustainable neighbourhoods by ensuring that new homes of the right type are built in the right location, and to support the economy by new home building and ensuring homes remain affordable.
- 7.4 The Local Plan must meet the full objectively assessed need for affordable housing in the housing market area. **Criteria A** will help to ensure that there is a sufficient supply of good quality affordable housing is distributed throughout the District, particularly in the areas of highest need.
- 7.5 Evidence in the SHMA concludes that Bradford District can be described as a self-contained housing market area and justifies the need for affordable housing in the District. The latest assessment identifies shortfalls in affordable housing across the District and estimates an overall net annual requirement for approximately 587 new affordable homes. Based on this need and the annual total housing requirement the SHMA recommends an overall District-wide affordable housing target of 20% to 25%.
- 7.6 Given pressures upon development viability in parts of the main urban areas identified in the AHEVA and Local Plan Viability Assessment, **Criteria A** identifies that in order to meet the overall district wide affordable housing target, grant funding and any other forms of subsidy and funding for affordable housing should be directed towards development in the areas of highest need.
- 7.7 The NPPF states that where there is an identified need for affordable housing, policies should be set to meet this need on site. As outlined above, evidence in the SHMA identifies the need for affordable housing in the District and justifies the inclusion of Policy HO11.
- 7.8 **Criteria B** sets out when affordable housing contributions will be required and the proportions of affordable housing which will be sought across the District to help meet the overall need for affordable housing. The affordable housing targets in Policy HO11 have been reviewed since the Core Strategy FED to reflect the latest estimates of affordable housing need and NPPF viability requirements.



- 7.9 The targets and thresholds in **Criteria B** are based on a range of considerations including housing need, affordability, viability and the delivery of affordable housing through other sources.
- 7.10 In terms of housing need the SHMA estimates varying levels of need for affordable housing within the 7 SHMA sub areas. Given the extent of population and household growth envisaged over the whole of the plan period and not just to the next 5 years, which the CLG model is designed to address, the SHMA recommends a simple approach to defining affordable housing targets for all sub areas. On the basis of a net shortfall of 587 each year, the SHMA Update (2013) recommends an overall District-wide affordable target of 20%-25%.
- 7.11 The NPPF requires that affordable housing targets should also be determined with reference to economic viability of delivering affordable housing. The targets in **Criteria B** have been informed by viability evidence in the AHVEA and Local Plan Viability Assessment. The AHEVA indicates that viability differs greatly across the district. In some areas there is pressure on development viability. These areas are mainly located in areas of inner Bradford and Keighley. The Local Plan Viability Assessment identifies a similar pattern of viability issues in the lower value areas (i.e. the urban areas of Bradford and Keighley). The target for these areas is 15% to reflect viability issues, while still helping to meet the identified need for affordable housing in these areas.
- 7.12 In regards to higher value areas both the AHEVA and Local Plan Viability Assessment indicate affordable housing targets in the highest value areas of the District are able to withstand affordable housing requirements. Despite viability evidence indicating the highest value areas are able to withstand higher affordable housing impacts, the target for Wharfedale is reduced to 30% to reflect the latest evidence of housing need. The reason the target in Wharfedale is higher than the rest of the District reflects two further factors, firstly affordability and secondly likely levels of land supply and therefore the likely number of opportunities to secure affordable housing contributions. The relatively more acute affordability issues in Wharfedale together with the strategic emphasis in the plan to limit the level of allocations for housing development there for sustainability reasons, means that the level of affordable housing required is only likely to be delivered if a higher percentage target than other parts of the District is applied.
- 7.13 The target for the Shipley and Canal Road Corridor and towns, suburbs and villages has been reduced to 20% to reflect the latest evidence of housing need and in response to viability issues identified in the Local Plan Viability Assessment. The assessment identified that even allowing for a significant improvement in market conditions there remain some locations in the District where development is unlikely to be able to withstand the cumulative impact of the policy standards and obligations proposed in the Core Strategy FED. Therefore the affordable housing target has been reduced to avoid putting the delivery of the plan at risk and to conform to NPPF viability requirements. This will also unlock potential for greater contributions in other areas, such as CIL, while still helping to meet the affordable housing need in these areas.
- 7.14 It is considered that the affordable housing targets in **Criteria B** are justified in terms of housing need and viability. The latest evidence in the SHMA update

identifies the highest affordable housing need within the City of Bradford sub-areas and Keighley and Worth Valley. As the distribution of the Core Strategy housing requirement (Policy HO3) is heavily focused on the larger urban areas and settlements within the District, the majority of the affordable homes secured through developer contributions will be delivered in areas of highest need and the most sustainable locations in terms of access to jobs and facilities. The targets are also set at a level which is considered viable and deliverable over the life of the plan and are subject to viability. This will ensure the Policy HO11 does not undermine housing delivery and will facilitate development throughout the economic cycle.

- 7.15 In terms of the threshold for affordable housing contributions, **Criteria C** requires affordable housing to be delivered on housing sites of 15 dwellings or more and on sites over 0.4 hectares in size to help meet the identified affordable housing need and promote mixed communities. It is considered this threshold is justified as the AHEVA and Local Plan Viability Assessment indicate that affordable housing can be delivered on sites of 15 dwellings or more over the plan period.
- 7.16 Based on an analysis of housing need and affordability and the likely scale and pattern of housing growth, the SHMA recommends consideration should be given to lowering the 15 dwelling threshold in the Wharfedale sub-area and the rural villages in the District. To ensure deliverability a commuted sum on smaller sites may be appropriate where justified by viability issues.
- 7.17 In terms viability the AHEVA tested site size thresholds and found that a threshold of 5 units on sites in higher value areas of the District can produce developable, deliverable sites. In the lower value areas testing showed that the majority of sites below 15 dwellings are not capable of delivering affordable housing. **Criteria C** reflects these findings and the site size threshold is lowered to 5 dwellings in Wharfedale, and the villages of Haworth, Oakworth, Oxenhope, Denholme, Cullingworth, Harden, Wilsden, and Cottingley.
- 7.18 **Criteria D** will seek to ensure an appropriate mix of affordable housing in terms of size, type and tenure. This is in accordance with the NPPF which requires planning authorities to identify the size, type, tenure and range of housing that is required. **Criteria D** will also support Policies HO8 Housing Mix and HO9 Housing Quality by ensuring developments provide a mix of housing types and tenures that meet local requirements and needs. Analysis in the SHMA update suggests that primarily, delivery of one and two bedroom houses and flats is a priority. However, in the longer-term interests of community sustainability there is an ongoing need for a range of household sizes to deliver sustainable mixed communities and meet the needs of families. As the Core Strategy is a strategic document, **Criteria D** is not unduly prescriptive and does not specify percentages of different affordable house types and tenures across the District.
- 7.19 The Council's preferred tenure mix of 70:30 social rent: intermediate will be the starting point for all affordable housing negotiations. This tenure mix was assessed in the AHEVA. The AHEVA identified the council's preferred tenure mix may be chosen as the starting point for all affordable housing negotiations. However, in the context of small sites it may be necessary to apply flexibility to ensure delivery and satisfy the needs of the local community. To ensure the delivery of affordable housing types and sizes

appropriate to local need **Criterion D** allows for the affordable housing mix to be considered on a site basis and reflect the most up to date evidence of affordable housing need and viability considerations.

- 7.20 The NPPF requires affordable housing policies to be sufficiently flexible to take account of changing market conditions over time. To reflect the recommendations of the viability assessment and ensure delivery through the plan period **Criteria E** sets out that the affordable housing targets in **Criteria B** are subject to viability. This will ensure Policy HO11 is not unduly rigid and will allow development to come forward, whilst meeting the housing need of the District, as it allows for the viability and circumstances of individual sites to be taken account of in the determination of the affordable housing contribution being sought.
- 7.20 The NPPF states that in rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. It is considered that the evidence of affordable housing need as set out in the SHMA and the likely overall restraint on housing development in the smaller and rural settlements of the District means that the Allocations DPD will need to consider and if necessary allocate rural exception sites as set out in **Criteria F**.
- 7.21 The Core Strategy can at this stage be no more precise since the allocation of such sites will be a finely balanced decision based on the need for such housing and the number, type and environmental sensitivity of candidates for rural exception. In some cases there may be sufficient land within settlements to meet need without resorting to areas covered by policies which normally protect land from development, in others there might not. The Allocations DPD will however, include a policy setting out the framework within which speculative planning applications on non allocated sites will be judged. Here the priority will be to ensure that those areas which are most sensitive and most crucial to the maintenance of a robust green belt are protected as set out in **Criteria G**.

### **Sustainability Appraisal**

- 7.22 The **Sustainability Appraisal** of the Core Strategy Publication Draft (2014) concludes that Policy HO11 has significant positive impacts in relation SA Objectives 8 and 13. The SA identifies Policy HO11 has positive impacts in relation to housing since it will help to make housing affordable for the District's population, which helps people to live in high quality housing which reflects people's needs, preferences and resources. There are also social and health benefits, as the policy will allow more people to live in their own home.
- 7.23 The SA notes that viability can be a problem in urban areas which is reflected in the lower percentage requirement for inner Bradford and Keighley. This approach will still help to deliver affordable housing in these areas but will help avoid viability issues restricting developing in these areas.

- 7.24 The SA also notes that Policy HO11 is in accordance with the NPPF which requires planning authorities where affordable housing need is identified to set policies for meeting this need on site.

### **Summary**

- 7.25 It is considered that Policy HO11 Affordable Housing is fully justified and will help ensure that the council meets the full objectively assessed need for affordable housing in the district's housing market area as far as is consistent with the policies set out in the NPPF.
- 7.26 In conclusion it is considered Policy HO11 is in full compliance with NPPF paragraphs 47-50 and 54, and has been informed by the most up to date evidence in the Bradford SHMA 2010 and SHMA Update 2013, AHEVA and Local Plan Viability Assessment. This is in conformity with NPPF housing evidence requirements set out in paragraph 159 and the viability and deliverability requirements in paragraph 173-174.