



THE HOME BUILDERS FEDERATION

Local Plan Group
City of Bradford Metropolitan District Council
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Date: 25th March 2014

Email: ldf.consultation@bradford.gov.uk

Sent by Email only

Dear Sir / Madam,

City of Bradford: Core Strategy (Publication Draft)

Thank you for consulting with the Home Builders Federation (HBF) on the publication draft of the Core Strategy.

The HBF is the principal representative body of the house building industry in England and Wales and our representations reflect the views of our membership of multinational PLCs, through regional developers to small, local builders. Our members account for over 80% of all new housing built in England and Wales in any one year including a large proportion of the new affordable housing stock.

We would like to submit the following representations on the publication draft.

The HBF would also like to attend the examination in public to debate these matters further.

General Issues

There is significant policy repetition between different policies within the plan. This creates a lengthy plan containing a significant number of policies. This inevitably leads to the potential for conflict and confusion. The Council may wish to consider rationalising the plan by combining policies wherever possible.

Duty to Co-operate

The Council has not provided sufficient evidence to clearly demonstrate that it is legally compliant with the duty to co-operate.

Despite the provisions of the NPPF, the Core Strategy deals with cross-boundary issues only in a very cursory way. The Core Strategy fails to adequately demonstrate that it has given sufficient attention to planning matters outside the district that may impinge upon the district, or how proposals contained in the Bradford Core Strategy may impact upon others.

The Councils background paper 'Background Paper 1: Overview' does allude to work at a city region level. Paragraph 3.5 refers to an Interim Strategy Statement indicating that authorities will continue with certain Regional Spatial Strategy (RSS) policies. It is, however, difficult to ascertain what these policies are as paragraph 3.5 provides no explanation. It should be noted that continuation with such policies will not necessarily satisfy the requirements of the NPPF. The withdrawal of the Kirklees Core Strategy, a neighbouring district to Bradford using the same approach, due to issues over compliance with the duty is testament to this.

Paragraph 3.7 of the background paper further indicates that at Leeds City Region Level a common methodology for capturing 'beyond the plan area' issues has been developed. This is expanded upon in Appendix 1 of the background paper. It is noted that the actions column of the appendix still leaves many issues unanswered particularly around the need for a green belt review and objectively assessed housing needs across Leeds City Region. This is unsatisfactory; the NPPF requires Bradford to show how it has co-operated with other local authorities to devise a positive planning strategy that will enable development requirements to be met which cannot be wholly met by certain individual members of the constituent local authorities. For example, using the issue of housing, Bradford is adopting a new housing requirement that is lower than the target that had been set by the RSS. Neither the Core Strategy nor the evidence base adequately explain the process by which this target was agreed as being appropriate with the adjacent authorities and how this requirement reflects those decisions and the plans of other authorities.

The appendix to the background paper and evidence supporting the Core Strategy clearly illustrate that Bradford has inter-linkages with neighbouring authorities. Given these evident relationships it is imperative that the Council indicates how discussions with these and other bodies have led to specific actions which have informed the preparation of the plan. The importance of identified actions resulting from fulfilment of the duty is clearly articulated within the National Planning Practice Guidance (NPPG) which states *'it is unlikely that this (the duty) can be satisfied by consultation alone'* and that *'inspectors will assess the outcomes of the co-operation and not just whether local planning authorities have approached others'*.

The guidance is echoed in recent concerns raised by inspectors over compliance with the duty. The plans of Coventry, Hart, North West Leicestershire and Kirklees Councils are such examples. In all cases the inspector noted that compliance with the duty needs to go beyond merely consulting with neighbouring authorities, but rather it should implement actions and have evidence of high level agreements to tackle strategic issues, including housing. The example of Kirklees is particularly pertinent for Bradford given that

they were at the forefront of developing the common methodology for capturing 'beyond the plan area' impacts within Leeds City Region, yet still failed to convince their inspector that they had discharged the duty.

It is noted that paragraph 3.11 of '*Background Paper 1: Overview*' indicates that a separate paper will be produced on the duty to co-operate following submission of the Core Strategy. The Council will be aware that the duty cannot be satisfied after submission and therefore any information relating to the Core Strategy can only be reliant upon actions already undertaken.

Recommendation

It is recommended that prior to submission the Council clearly articulates the co-operation that has occurred, what issues were identified and how this has impacted and resulted in changes to the preparation of the plan.

Plan Period

The plan is unsound as it will not be effective in delivering the strategy over the time horizon of the plan. It is recommended that the plan period be extended beyond 2030 to ensure a minimum of 15 years from the adoption of all Development Plan Documents (DPDs) which will allocate land for development.

The NPPF, paragraph 157, indicates that plans should be drawn up over an appropriate timescale with a preference for 15 years. Whilst it would appear that the Core Strategy would achieve should a timescale, presuming it can be adopted during 2015, significant elements of the plan such as allocations and green belt releases are delegated to subsequent documents.

The Council do not appear to have an up to date Local Development Scheme (LDS) to identify when these other documents will be adopted. It does appear unlikely that, given the significant work still required on these documents, they will be adopted prior to the end of 2015. Therefore the overall plan period is likely to be significantly shorter than the 15 years advocated in the NPPF. Given the complexity of bringing sites forward, the time taken to prepare planning applications, secure permission and build out developments (especially if these need to be co-ordinated with significant infrastructure investments) then a plan period beyond 2030 to ensure a minimum of 15 years for the whole plan is required.

Recommendation

It is recommended that the end date of the Core Strategy be extended to account for the likely adoption of the subsequent documents which will allocate land for development.

Vision and Strategic Objectives

The HBF generally supports the pro-growth aspirations of the plan vision and many of the strategic objectives particularly with regards housing and economic growth. With regards housing growth it is recommended that the objectives refer to meeting the **full** needs of current and future residents to ensure conformity with the National Planning Policy Framework.

Strategic Objective 2 is, however, considered unsound as it is not in conformity with national policy.

Strategic Objective 2 refers to the prioritisation of previously developed land. This is an out dated approach which is no longer consistent with the NPPF. Paragraph 111 of the NPPF seeks to encourage, not prioritise, the effective use of previously developed land. In addition to provide greater conformity with paragraph 47 and the government's push towards significantly boosting housing supply the objective should seek to meet the full housing needs of the area.

Recommendation

It is recommended that the objective be amended as follows;

*'To ensure that the district's **full** needs for housing, business and commerce are met in sustainable locations that reduce the need to travel and are well served by public transport and services, whilst prioritising **encouraging**, the use of deliverable and developable previously developed land. In so doing overcrowding within the existing housing stock should be reduced.*

Strategic Core Policy 5 (SC5): Location of Development

The policy is considered unsound as it is contrary to the requirements of the NPPF cannot be justified and will prove ineffective, rendering the plan undeliverable.

The policy seeks to place a sequential approach upon the location of development with brownfield given the highest priority. The NPPF encourages the re-use of previously developed land it does not prioritise such re-use. The Council's 'Local Plan Core Strategy – Viability Assessment. Sept 13' identifies the serious challenges facing the Council in that much of Bradford and Keighley which are anticipated to take the majority of growth remain unviable under current market conditions (Table 4.4) even with no policy contributions. The net effect of this policy will be to further exacerbate the situation by prioritising the use of previously developed land which is likely to be more costly.

Part B of the policy identifies a criteria based approach based upon the sustainability of the site. It is recommended that this be the prime determinant for the location of development rather than the sequential approach indicated in Part A.

Recommendation

Part A of the policy be deleted.

Strategic Core Policy 7 (SC7): Green Belt

The policy is unsound because it is ineffective as it delegates important decisions to a later document.

The HBF is generally supportive of the Council undertaking a review of the Green Belt to accommodate its development needs. It is, however, noted that

the Council is only intending this to be a selective review with boundaries to be set within the Allocations DPD. The Core Strategy clearly demonstrates a need to revise the Green Belt but does not provide any real guidance upon the location or a methodology for undertaking the revisions. The HBF is concerned that this important matter is being delegating to another document at some unspecified point in time. If the delivery of the housing target requires amendments to the Green Belt the general areas for release should be clearly indicated within the Core Strategy. The key diagram whilst identifying areas suggests they are only indicative and other settlements may be included, providing no real certainty. Failure to provide adequate guidance within the Core Strategy will perpetuate the continued under-delivery on the Councils housing targets, uncertainty for the development industry and an increase in planning appeals.

Given the challenges for development within Bradford and the need to ensure that viable sites can be brought forward through the plan it is strongly recommended that the Green Belt review be strategic in nature. This should ideally be done in conjunction with neighbouring authorities to assess the scale and need of the required releases. Paragraph 3.103 of the plan notes that such a strategic review is required but then delegates this to an unspecified plan review at a later date. The Council will be aware that the Main Modifications to Leeds Core Strategy suggested by their Inspector indicates a selective review to be inappropriate. The Inspector's modifications require the Council to undertake a more thorough review and remove the word selective from the plan. The HBF argues that a similar approach is required in Bradford.

Recommendation

It is recommended that the Council undertake a full review of the Green Belt in conjunction with neighbouring authorities. This should then be used to identify general areas of release within the Core Strategy. This will not only ensure joined up cross boundary working and preservation of the most important aspects of the West Yorkshire Green Belt but will also provide long-term certainty for the development industry and residents alike.

Figure HO1: 10 Principles For Achieving Sustainable Housing Growth

The principles are considered unsound as they are not consistent with the NPPF and are not justified.

The principles for achieving sustainable housing growth are noted. The HBF do not consider the following principles to be sound;

- Principle 2: Prioritising brownfield land – this is contrary to the NPPF which encourages rather than prioritises;
- Principle 4: Phasing of release for infrastructure and take up of brownfield land – the NPPF provides no basis for such phasing; and
- Principle 6: Ensuring inclusion local carbon technologies and renewable energy generation – the Council's viability study does not support such requirements. The government's review of standards is also seeking to ensure energy requirements are solely included in the Building Regulations.

These principles are explored in greater detail within the relevant policies below.

Policy HO1: The District's Housing Requirement

The proposed housing requirement is considered unsound as it is not justified by the evidence or positively prepared and will not meet the objectively assessed needs of the area.

The HBF supports the expression of the target as a minimum but the overall proposed plan requirement of at least 42,100 net new dwellings over the period (2013 to 2030) is too low when considering the available evidence. The chosen housing requirement is essentially 37,400 dwellings plus the backlog accrued due to under-delivery since 2004 equating to a further 7,687 dwellings, minus an allowance for 3,000 empty properties which the Council intends to be brought back into use during the lifetime of the Core Strategy. The following comments relate to each of these elements separately.

Backlog

The HBF agrees that the backlog due to the under-delivery of 7,687 dwellings should be included within the plan. In accordance with a number of recent appeals and the NPPG this under-delivery should be dealt with in the first five years of the plan and therefore the Council will need to ensure that it has sufficient sites which can deliver immediately.

Empty homes

Whilst the HBF does not doubt the need to bring empty housing back into use we are concerned that the Council is discounting the overall requirement by 3,000 units to take account of its ambitions. The HBF note the Council's statement in Policy HO10 which indicates interventions and investment priorities will be set out within the Council's District Housing Strategy, the Council's Empty Homes Delivery Plan, its Neighbourhood Development Frameworks, Neighbourhood Action Plans and within a Householder SPD. However, at this stage, the HBF has found no evidence to substantiate the Council can achieve such a reduction. Without such evidence it is not justified to discount these 3,000 properties. It is also questionable whether such homes actually add to the supply. Unless the empty properties have been taken out of the overall supply of housing in Bradford, the Council should not seek to reduce the overall requirement on the basis they are being brought back into use as this will effectively double-count these properties.

Recommendation

It is recommended that any empty homes brought back into use are viewed as additional to the overall requirement, rather than part of it.

Housing requirement

The Council's actual assessment of need is indicated in the plan as being 37,400 dwellings over the plan period. This equates to 2,200 dwellings per annum (dpa). This is significantly less than the former RSS approach which advocated a requirement of 2,700dpa for Bradford (2008 to 2026). The 2,200

requirement does not relate directly to any demographic projection, the Strategic Housing Market Assessment (SHMA) or any of the modelled housing scenarios. It is a hybrid scenario which simply takes the mid-point between two modelled economic scenarios, which are discussed in greater detail later. There is no direct justification for this approach and therefore the HBF contends it is not an objectively assessed need.

In determining an objectively assessed housing requirement the NPPG and the PAS document 'Ten key principles for owning your housing number - finding your objectively assessed needs' both identify the assessment should be based upon the most recent demographic data, a credible up to date Strategic Housing Market Assessment (SHMA) and the development of credible evidence based scenarios including the effects of the economic ambitions of the market area. It should also deal with any unmet requirement and cross-boundary issues.

Demographic data

The 'What Homes Where' toolkit, a free to use independent source of government statistics, identifies a need for 48,845 net dwellings over the plan period (2013 to 2030). This equates to 2,873dpa in Bradford, significantly more than is currently being planned for.

The more recent, although only interim, 2011 based interim Sub-National household projection (2011 SNHP) identify a need for 15,900 net new dwellings between 2011 and 2021 or 1,590dpa. The use of the 2011 SNHP need to be considered with caution for a number of reasons. Most obviously they are only interim and do not cover the full plan period and they are reflective of a period of recession. The recessionary effect has manifested itself in lower headship rates than previous projections. This reduction in headship rates is an anomaly when considered against the previous trends of increasing headship rates in earlier projections. A recent Town and Country Planning Association paper (*New estimates of housing demand and need in England, 2011 to 2031* by Alan Holmans) identifies much of the suppressed household formation rate contained within the 2011 figures is due to the economic recession. Therefore under more favourable economic conditions, expected in future years, it is highly likely there will be a return to higher rates of household formation.

This issue of using the 2011 SNHP was recently raised by the Inspectors of both the Lichfield Local Plan and South Worcestershire Local Plan who note that Councils **should not** plan on the basis of the 2011 headship rates. The Inspector into the Lichfield Local Plan noted in his initial concerns;

'over the longer term household representation rates have been rising and the fall in these rates identified in the 2011 projection is likely to have been driven by short term factors such as the impact of the recession, constraints on housing supply and constraints on mortgage lending. It is reasonable, therefore, to assume that beyond 2021 (the end of the period covered by the 2011 projection) household representation rates will resume their long term rise' (paragraph 24).

The HBF therefore do not recommend the use of the 2011 SNHP.

Strategic Housing Market Assessment (SHMA)

The government places significant emphasis upon the SHMA in identifying;

the scale (our emphasis) and mix of housing and the range of tenures that the local population is likely to need over the plan period' (NPPF paragraph 159).

The most recent SHMA for Bradford (2013 update), indicates an annual net affordable housing requirement of 587 per annum. This would represent approximately 27% of all housing developed, using the Council's proposed housing requirement, to be affordable. As discussed in greater detail in comments against Policy HO11 this is unlikely to be a viable proposition given the location and types of site currently being progressed through the Bradford Core Strategy. To ensure that the plan achieves the full needs for both market and affordable housing will therefore require an uplift in the provision of market housing.

Economic aspirations

The plan is clear through its vision and strategic objectives that it is seeking economic growth. These statements of intent are welcomed by the HBF, but unfortunately these aspirations do not appear to have fully transferred into the housing requirement. The new government guidance to support the NPPF and the recent PAS guidance *'Ten key principles for owning your housing number - finding your objectively assessed needs'* clearly acknowledge the links between economic and housing growth and the need to consider this in the plan making process.

Policy EC2: Supporting Business and Job Creation identifies an aspiration to create at least 2,897 jobs annually. It is therefore confusing why the work upon a housing requirement figure uses a significantly lower target of 1,600 jobs annually (para 6.7, Bradford District Housing Requirements Study, February 2013). If as plan policy SC3: Working Together indicates the Council is intending to *'balance housing with current and future employment opportunities'* surely the housing requirement should be based upon the same employment aspirations set out within Policy EC3. The implications of a higher employment requirement would undoubtedly increase the housing requirement within Bradford.

The current housing requirement is based upon a hybrid scenario which sits between two economic scenarios. Both are based upon the lower annual requirement for 1,600 jobs but differ due to the use of the 2008 and 2011 SNHP. The chosen figure simply sits at the mid-point between the 2008 and 2011 SNHP based economic scenarios. The HBF contends this is likely to underestimate the housing need based upon 1,600 jobs due to the fact the figure is influenced by the 2011 SNHP which as discussed earlier is associated with a period of recession. There is no assessment of the higher jobs growth requirement of 2,897 jobs identified in Policy EC2.

Recommendation

The Council's recognition of the need for growth is welcomed, however the overall plan housing requirement is not considered sufficiently ambitious when considered against the affordable housing need identified in the SHMA and the economic aspirations of the Council.

If the Council truly wish to achieve job growth of 2,897 per annum and balance the housing and economic aspirations a new housing requirement should be set based upon the modelled effects that such a scenario would create. This is likely to require a significant uplift in the overall housing requirement for Bradford.

Policy HO3: Distribution of Housing Development

The policy is considered unsound as it will be ineffective in achieving the plans housing requirement.

The policy seeks to apportion development to specific localities within the area. Whilst in principle the HBF has no issue with such an approach the spatial approach taken by the Council appears to pay little attention to the viability issues concerned with developing in parts of the district. The HBF, therefore, questions whether given the viability issues apparent within the '*Local Plan Core Strategy – Viability Assessment, Sept 13*' the Council will be able to achieve the amount of development required. This is particularly apparent within the inner areas of Bradford and Keighley which the Council anticipate will take substantial growth.

If the Council intend to continue with such an approach it is imperative that flexibility is built into the plan to ensure other areas can accommodate any under-delivery from the more viability compromised areas. In addition it is strongly recommended that sites within the low value areas are not subject to the full policy burdens of the plan.

Recommendation

The plan have greater flexibility to ensure that the overall housing requirement can be delivered and that the lowest value areas are not subject to policy burdens to provide them with the greatest opportunity to deliver.

Policy HO4: Phasing the Release of Housing Sites

The policy is unsound as it is contrary to national policy and will be ineffective in assisting to meet the housing requirements of Bradford.

The policy seeks to phase the release of sites based upon a number of criteria including meeting targets for previously developed land, regeneration initiatives and maintaining a 5 year supply of housing. It is noted that the Council does not currently have a 5 year supply (2012 AMR and 2013 SHLAA update) due to deliverability issues on a number of sites. Indeed the Council can only demonstrate approximately 2.3 years supply. To overcome this significant shortfall the Council should seek to identify viable sites to bolster supply and provide early delivery. Phasing of sites will not achieve such results, particularly as the Council are seeking the phasing requirement to promote sites in

regeneration areas and on previously developed land which are likely to have significant economic viability issues.

It should also be noted that the NPPF does not provide any justification towards phasing. The recent interim conclusions of the inspector appointed to undertake the examination of the South Worcestershire Local Plan recommends the deletion of a proposed phasing policy.

In addition whilst the NPPF (paragraph 111) enables the Council to set a target for previously developed land this must be based upon evidence including deliverability of such sites. The NPPG is also clear that whilst previously developed land is sometimes desirable to deliver the local authority must have regard to their deliverability and the risks this will pose to the delivery of the whole plan. Within many areas of Bradford it appears that such land will be severely compromised by and therefore the overall deliverability of the plan must be questioned.

If the Council can justify any targets for previously developed land, based upon robust evidence including viability, the targets should be seen as a whole plan requirements and not a year on year target as this will simply stall sustainable and viable developments from coming forward. The impact of this will be to thwart the Council's attempts of achieving a 5 year housing land supply.

Recommendation

It is recommended that the policy be deleted.

Policy HO5: Density of Housing Schemes

The policy is unsound as it has not been justified by evidence and will place additional constraints upon development.

The policy seeks a minimum density of 30dph across all sites. It is unclear whether such a requirement relates to net or gross site areas. Given other requirements within the plan, such as open space and Policy DS3 it is important that any requirement should relate solely to the net developable area. Whilst Paragraph 47 of the NPPF permits the Council to set out its approach to housing density to reflect local circumstances the HBF has not seen any substantive evidence to support the Council's position. It should also be noted that the policy requirements may create conflict with other policies particularly Policy HO8, which seeks larger homes and need for accessible homes both of which need larger floor areas and therefore will reduce densities, and Policy DS3 which seeks development to be within the context of its urban character.

Recommendation

It is recommended that the policy be re-worded to ensure that development densities simply reflect the character and setting of the area in which they are located.

Policy HO6: Maximising the Use of Previously Developed Land

The policy is unsound as it is not justified by evidence that the targets can be achieved without detrimentally effecting the delivery of the housing requirement.

The NPPF paragraph 111 does enable local authorities to set targets for the percentage of development upon previously developed land. Such targets must, however, be justified by evidence and ensure delivery of the overall housing requirement. The Council's own evidence (Local Plan Viability Assessment) identifies viability issues across much of the Bradford area. This policy will simply exacerbate existing viability issues and perpetuate the current under-supply of dwellings against current and future housing requirements.

The NPPG is also clear on this point stating;

'Local Plan policies should reflect the desirability of re-using brownfield land, and the fact that brownfield land is often more expensive to develop. Where the cost of land is a major barrier, landowners should be engaged in considering options to secure the successful development of sites. Particular consideration should also be given to Local Plan policies on planning obligations, design, density and infrastructure investment, as well as in setting the Community Infrastructure Levy, to promote the viability of brownfield sites across the local area. Provided sites are likely to deliver a competitive return for willing landowners and willing developers authorities should seek to select sites that meet the range of their policy objectives, having regard to any risks to the delivery of their plan.'

If the Council can evidence that the proposed targets are viable, which appears doubtful, it is recommended that they be flexible targets to ensure a 5 year supply can be maintained and that the targets are for the whole of the plan period, not a year on year target. Failure to maintain a five year supply will simply render this and other housing policies out of date (NPPF paragraph 49). It is also recommended that the policy burdens upon such sites be reduced in line with the NPPG.

Recommendation

The Council must demonstrate the deliverability against its targets for previously developed land taking account of the viability of sites, level of contributions sought and the overall housing requirement. If the targets cannot be justified they should either be removed or amended to represent a more achievable target. It is also recommended that any targets are for the whole plan period to ensure flexibility within the plan is maintained.

Policy HO7: Housing Site Allocation Principles

Part C of the policy is considered unsound as it is not justified and will detrimentally effect delivery of the plan.

Part C of the policy seeks to maximise the use of previously developed land within the Plan area and prioritise their development via phasing policies. The issues of phasing and prioritising previously developed land are covered in our

comments against policies HO4 and HO6 which are equally relevant to this policy.

Recommendation

It is recommended that Part C of the policy be deleted.

Policy HO9: Housing Quality

The policy is unsound as it will place substantial additional burdens upon housing development which is not justified by the evidence.

The policy seeks to place a significant amount of additional burdens upon housing development. The Council's own viability assessment indicates that;

'The cumulative impact of the proposed policy standards shows that even in the more viable parts of the District, the impact could be to compromise / undermine the delivery of development' (Para 4.18.1, Local Plan Core Strategy – Viability Assessment, Sept 13')

The policy is therefore clearly contrary to NPPF paragraphs 173 to 177 which require Council's to ensure that the cumulative impacts of policies and standards does not unduly burden development and that the plan is deliverable. The Council's own evidence suggests that the implications of this policy combined with others will render the plan undeliverable.

The following comments are made against the specific elements of the policy.

Part A of the policy indicates that developments should be high quality and achieve good design. In principle the HBF agrees with such sentiments. Paragraph 5.3.136 of the plan further explains all sites over 10 units will be required to submit assessments of how they perform against Building for Life 12 standards (BfL12). Whilst the HBF is supportive of BfL12 and many house builders already accord to its principles the Council should not seek to make this a mandatory requirement for all developments. The proposals within paragraph 5.3.136 will simply create additional costs and burdens upon the development industry.

Recommendation

It is recommended that Part A and paragraph 5.3.16 be amended to encourage rather than require BfL12 standards.

Part B of the policy requires all developments to conform to the Code for Sustainable Homes level 4 (CfSH) from adoption and zero carbon from 2016. The Council will be aware that government are considering the withdrawal of the CfSH through its standards review. The government is also continuing to push for zero carbon homes by 2016. Given the latter is likely to be a mandatory requirement through the Building Regulations there is no need for the policy to repeat this issue. It is, however, important that the Council take account of the likely additional costs associated with both the CfSH and zero carbon. A recent study published by the Zero Carbon Hub (*Cost Analysis: Meeting the Zero Carbon Standard, Feb 2014*) indicates that the cost of achieving the

government's ambitions for zero carbon homes for a detached home is likely to cost in the region of £6,700 to £7,500 above current 2013 Part L costs. This is a significant cost which will have serious implications for development viability across the plan area. The 'Local Plan Core Strategy – Viability Assessment, Sept 13' starkly illustrates the issues the plan has with regards to viability once additional sustainable construction standards are applied. Table 4.9 illustrates that all but the two highest housing market value areas are incapable of withstanding CfSH level 4 under current economic conditions and only the very highest value area is capable of sustaining CfSH level 6 (Table 4.12).

Recommendation

It is recommended Part B and associated text be deleted.

Part C of the policy requires accessible homes adaptable to changing needs over the occupants' lifetime. Paragraph 5.3.140 interprets this as Lifetime Homes standards. Whilst the HBF is supportive of accessible homes and many developers already conform to such standards, the policy should seek to encourage rather than require a specific standard. The Lifetime homes website quotes additional costs per dwelling for implementing the standards to be in a range from £545 to £1615 per dwelling. This is not an insignificant figure when it is considered that much of the plan area is unviable or marginal even with no additional burdens placed upon it. In addition, due to the fact that Lifetime Homes generally require a larger footprint but do not provide additional revenue, the costs on site of providing Lifetime Homes are often multiplied. This issue does not appear to have been considered within the viability study.

The Council will also be aware that the government are considering the inclusion of accessibility standards into the Building Regulations to augment current Part M. If included the Council will be unable to identify further local standards.

Recommendation

It is recommended the wording of Part C and the supporting text be amended to encourage rather than require adaptable homes to ensure viability can be maintained. The following wording is recommended;

The Council will encourage and support new homes which are designed to be accessible and easily adaptable to support the changing needs of families and individuals over their lifetime, including people with disabilities.

Part E of the policy seeks to implement the space standards identified within paragraph 5.3.143. The Council has not provided any evidence to substantiate its choice of standards or why the Bradford area is sufficiently different to the rest of the country to apply such specific standards. The implications of requiring space standards will be to increase house prices to ensure that the additional costs of development are covered. This will inevitably have a 'knock-on' effect upon the availability of such housing to the lower end of the housing market, effectively pricing many families out of mainstream housing and increasing the need for affordable housing. The Council do note in its background paper upon housing (para 6.31) that the standards may not be

feasible or viable. It is therefore queried how the Council can justify the inclusion of the standards.

The Council also note that through the housing standards review government are considering the need or otherwise for national space standards. The HBF is firmly of the opinion that if such standards are required and justified these should be set at the national level and not on the whim of individual authorities.

Recommendation

Part E and associated references in the plan be deleted.

Policy HO11: Affordable Housing

The policy is unsound as the levels of affordable housing are not justified by the Council's own evidence and will render the plan undeliverable.

The HBF is supportive of a variable affordable housing target being applied across the plan area to take account of variable economic viability. The percentages suggested are, however, not supported by the viability evidence and are therefore considered unsound.

The *'Local Plan Core Strategy – Viability Assessment, Sept 13'* indicates that in all but the highest value markets across the plan area the proposed percentages of affordable housing are unviable (Table 4.22). Indeed even if the market picks up by 160% the 15% affordable housing target is unviable in the inner Bradford and Keighley areas (Table 4.24). The plan must, however, deliver from the date of its adoption. The HBF therefore contend that the targets are unsound and will have a detrimental impact upon the delivery of the plan.

The viability situation across the plan area is, however, significantly worse. Once the cumulative impact of all plan policies and obligations are considered a significant proportion of development within the area will be compromised. The *'Local Plan Core Strategy – Viability Assessment, Sept 13'* notes at paragraph 4.18.1 that;

'The cumulative impact of the proposed policy standards shows that even in the more viable parts of the District, the impact could be to compromise / undermine the delivery of development'.

This is a significant issue which the Core Strategy must address as failure to do so will render the plan undeliverable. To accord with NPPF paragraphs 173 to 177 the Council should review all of its policy requirements to ensure that they do not unduly burden development. In doing so the Council will have to make difficult choices over whether it wishes to prioritise affordable housing or sustainable construction policies. The evidence clearly indicates it cannot do both.

Part E of the policy indicates that the Council will negotiate where affordable housing contributions compromise the viability of sites. It does, however, appear that the majority of sites will need to endure this negotiation process which will ultimately slow down development. Whilst the HBF is supportive of

Part E it should not be used to retain an unsustainable policy. It is incumbent upon the Council to ensure that its policies are viable in the majority of cases with 'open-book' assessments retained for special cases only.

Recommendation

It is recommended that the affordable housing contributions be lowered to accord with the Council's own evidence. This will need to include a zero requirement within inner Bradford and Keighley. If the market improves sufficiently for the Council to justify the affordable housing contributions currently sought, it can seek a full or partial review of the plan at that time.

Information

I would be pleased if I could be informed of the following;

- Submission of the DPD for examination,
- receipt of the inspectors report, and
- if and when each Council intends to adopt the DPD.

I would be happy to discuss any comments made within this representation prior to submission of the document to the Secretary of State.

Yours sincerely,

[Redacted Signature]

[Redacted] **Good**
Planning Manager – Local Plans

[Redacted Contact Information]