

Report of the Director of City Development

Report to: Development Plan Panel

Date: 2nd July 2012

Subject: LDF Core Strategy – Publication Draft, Analysis of Consultation Responses: H5 Affordable Housing

Are specific electoral Wards affected? If relevant, name(s) of Ward(s):	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Are there implications for equality and diversity and cohesion and integration?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Is the decision eligible for Call-In?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Does the report contain confidential or exempt information? If relevant, Access to Information Procedure Rule number: Appendix number:	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

Summary of main issues

1. The Core Strategy Publication Draft was subject to 6 weeks public consultation during February – April 2012. Section 3 of this report summarises the issues raised and the Table in Appendix 1 suggests how the City Council should respond. Appendix 2 illustrates how the text of the Core Strategy would need to be altered.
2. Of the wide range of issues raised, none are considered to warrant any major changes to the Core Strategy and only a few minor changes. The analysis and suggested changes are set out in Appendices 1 and 2.

Recommendations

Development Plan Panel is requested to:

- i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

1.0 Purpose of this Report

- 1.1 Within the context of the Core Strategy Initial Report of Consultation (6th June), the purpose of this report is to review consultation responses in relation to affordable housing. Appendix 1 attached, summarises the representations, key issues raised, the City Council's view and proposed action.

2.0 Background Information

- 2.1 Following Consideration by the Development Plan Panel and Executive Board, a 6 week period of public consultation has been undertaken, commencing on 28th February to 12th April 2012. Consistent with the LDF regulations, this is a targeted stage of consultation, with emphasis upon requesting responses in relation to the "soundness" of the plan. Within this context, the consultation material comprised of a range of documents, which were subsequently made available on line or as paper copies, including:

- Core Strategy Publication Draft (Main Document)
- Sustainability Appraisal (& Non Technical Summary)
- Habitats Regulations Assessment Screening
- Equality Impact Assessment Screening
- Draft Infrastructure Delivery Plan
- Draft Core Strategy Monitoring Framework
- Health Topic Paper
- Report of Consultation on Preferred Approach (October – December 2009)

Links were also incorporated to the consultation web pages to the evidence based material, which has been prepared to help inform the emerging document (including the Employment Land Review, Leeds City Centre, Town and Local Centres Study, Housing Growth in Leeds, Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment and the Leeds open space, sport and recreation assessment.

3.0 Main Issues

- 3.1 A summary of the main issues which have been raised is provided below.

1. Evidence base.

- Concerns raised that the policy is unsound in relation to having no justified evidence base to support the upper 50% limit for affordable housing.
- Concern raised that the Policy is unsound as it does not assess the cumulative impact of affordable housing in conjunction with other policy requirements.

2. Targets.

- Targets of 5-50% are inappropriate for affordable housing as some sites will not be able to support any affordable housing, and the 50% target for is too high.

3. Thresholds.
 - Some concern that the threshold of 10-15 units for affordable housing provides no certainty
 - Concern that the policy is unsound and threshold should be lower.
4. Supplementary Planning Document (SPD)
 - Concern that the Core Strategy should set out affordable housing policy in full, that it is unacceptable for the SPD to set thresholds, targets, and mix.
 - Concern that the SPD should not set the affordable housing requirement on a regular basis, is unsound, adds delivery burden and is contrary to the National Planning Policy Framework.
5. Combine the Community Infrastructure Levy (CIL) and affordable housing policy.
 - Suggestion that the policy requirement for affordable housing be linked into a combined CIL and Affordable Housing policy.
6. Positive Planning for affordable housing.
 - The policy should inform of a need to plan positively in a manner that addresses the needs to deliver more affordable housing across the district using as many traditional and innovative ways as possible.

The vast majority of comments made by most respondents relate to the areas above. Concerns have also been raised as listed below by a smaller number of respondents.

7. Specialist housing
 - That elderly accommodation should be given a similar status as affordable housing and student housing developments exempted from affordable provision.
8. Tenures/ affordable rent.
 - Fails to adequately address affordable rent (submarket rent) category.
 - Terminology in relation to quartile and decile earnings is inappropriate.
9. Recycling properties/brownfield/self build
 - Use of empty brownfield sites, empty shops in conservation areas for affordable housing.
 - Include alternative methods of provision through encouraging similarly subsidised mutual self build schemes.
10. Reliance on private tenures
 - Objection that private tenures should not support the provision of social housing, and that the private rented sector is having to provide for the less well off in society.
11. Off site provision/ provision tied to the permission on alternative sites.
 - Policy is unsound as no provision has been made for off site or for contributions to be made in certain cases.
 - Provision tied to the permission, be provided on alternative sites where the need is greater.

12.Support

- Supportive of the provision of affordable housing in order to create a balanced community and suitable housing for all types of housing need.
- The policy provides an appropriate policy hook as the core strategy seeks to meet all housing needs and demands.
- Support for SPD and approach.

4.0 Corporate Considerations

As noted above, the Core Strategy, forms part of the Local Development Framework and once adopted will form part of the Development Plan for Leeds.

4.1 Consultation and Engagement

- 4.1.1 As outlined in this report, the Core Strategy Publication draft has been subject to a further 6 week period of consultation. This has been undertaken in accordance with the LDF Regulations and the City Council's adopted Statement of Community Involvement (SCI).

4.2 Equality and Diversity / Cohesion and Integration

- 4.2.1 An Equality Impact Assessment Screening was undertaken on the Core Strategy Publication draft, prior to consultation (see Core Strategy Executive Board Report, 10th February 2012). This concluded that equality, diversity, cohesion and integration issues had been embedded as part of the plan's preparation. For information and comment, the Screening assessment has also been made available as part of the supporting material for the Publication draft consultation. Within this overall context, it will be necessary to continue to have regard to equality and diversity issues, as part of the ongoing process of preparing the Core Strategy, including considering representations and next steps.

4.3 Council Policies and City Priorities

- 4.3.1 The Core Strategy, plays a key strategic role in taking forward the spatial and land use elements of the Vision for Leeds and the aspiration to the 'the best city in the UK'. Related to this overarching approach and in meeting a host of social, environmental and economic objectives, where relevant the Core Strategy also seeks to support and advance the implementation of a range of other key City Council and wider partnership documents. These include the Leeds Growth Strategy, the City Priority Plan, the Council Business Plan and the desire to be a 'child friendly city'.

4.4 Resources and value for money

- 4.4.1 The DPD is being prepared within the context of the LDF Regulations, statutory requirements and within existing resources.

4.5 Legal Implications, Access to Information and Call In

- 4.5.1 The DPD is being prepared within the context of the LDF Regulations and statutory requirements. The DPD is a Budgetary and Policy Framework document and as such this report is exempt from call-in by Scrutiny.

4.6 Risk Management

- 4.6.1 The Core Strategy is being prepared within the context of the LDF Regulations and the need to reflect national planning guidance. The preparation of the plan within the context of ongoing national reform to the planning system and in responding to local issues and priorities, is a challenging process. Consequently, at the appropriate time advice is sought from a number of sources, including legal advice and advice from the Planning Advisory Service and the Planning Inspectorate, as a basis to help manage risk and to keep the process moving forward.

5. Conclusions

- 5.1 This report provides an overview of the issues raised about policy H5. It is not considered that any of the issues raised are compelling enough to justify any major changes to the Core Strategy. Two of the issues generate minor wording changes and all of the others warrant no further changes.

6. Recommendations

- 6.1 Development Plan Panel is requested to:

i). Endorse the analysis of the issues raised and any suggested Core Strategy text changes (as detailed in Appendices 1 and 2 to the report) for presentation to Executive Board for approval.

7. Background documents¹

- 7.1 A substantial number of documents are available representing various stages in preparation of the DPD and the background evidence base and Equalities Impact Assessment Screening. These are all available on the City Council's web site (LDF Core Strategy Pages) web pages or by contacting David Feeney on 247 4539.

¹ The background documents listed in this section are available for inspection on request for a period of four years following the date of the relevant meeting. Accordingly this list does not include documents containing exempt or confidential information, or any published works. Requests to inspect any background documents should be submitted to the report author.

Appendix 1:

Core Strategy Publication Draft - Analysis of Consultation Responses

Policy H5 Affordable Housing

Representor (include agent)	Representor Comment	LCC Initial Response	Action
Policy H5 Affordable Housing			
Evidence base			
<p>0480 Taylor Wimpey (via Dacre Son & Hartley)</p> <p>0480 Barrats Leeds (via Dacre Son & Hartley)</p> <p>0480 Warner (via Dacre Son & Hartley)</p> <p>0480 Kebbell (via Dacre Son & Hartley)</p> <p>0480 Barrett York (via Dacre Son & Hartley)</p> <p>0480 Keyland (via Dacre Son & Hartley)</p> <p>0480 Miller (via Dacre Son & Hartley)</p> <p>0480 Redrow (via Dacre Son & Hartley)</p> <p>0480 Chatford (via Dacre Son & Hartley)</p> <p>0480 Mirfield (via Dacre Son & Hartley)</p> <p>5671 Great North Developments Ltd (via ID Planning)</p> <p>5671 Consortium of Housebuilders Ltd (via ID Planning)</p> <p>5671 Housebuilders Consortium</p> <p>5671 Barratt David Wilson (via ID Planning)</p> <p>Homes</p> <p>5671 Robert Ogden Partnerships Ltd (via ID Planning)</p> <p>5671 ELE Northern Quarant Consortium (via ID Planning)</p> <p>5671 Edmund Thornhill,</p>	<p>Policy is unsound in relation to having no justified evidence base to support the upper 50% limit for the Affordable Housing target range. Its introduction and subsequent amendment via an SPD would be ineffective.</p>	<p>The evidence is derived from the Economic Viability Assessment (EVA) 2010. The EVA outlines that targets of 50% should be achievable in certain areas in certain market conditions. The SHMA (2011) provides further evidence on the need for affordable housing.</p>	<p>No change.</p>

<p>Thornhill Estates (via ID Planning) 5671 Worthlea Estates Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes (Yorkshire) Ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning) 5895 Barratt David Wilson Homes Yorkshire Homes</p>			
<p>0092 Home Builders Federation</p>	<p>The policy is unsound it introduces a very broad range of affordable housing targets, the Council has not assessed what impact these ranges might have on viability of developments in particular the specific housing market areas of the district and in combination with other policies specified in the CS such as 20% increase in Part L of the Building Regulations, which is contrary to the NPPF (para 174 &177 requiring that costs of any local requirements be added and assessed at the plan making stage to ensure that these are viable and will not impede delivery). The Council is relying on site-based viability assessments in order to avoid the need to properly assess the cumulative impact of its plan policies on development. Object to site by site basis viability assessment. If there is doubt regarding targets then a lower target should be set. The economic viability assessment 2010 states that certain areas cannot support any AH, plans need to be deliverable.</p>	<p>An EVA was carried out in 2010. Some account was taken of the financial effect of existing policies including affordable housing.</p> <p>A CIL economic viability study (Oct 2012) will further take into account policies and assess the cumulative impact of Core Strategy policies and NPPF policy changes which have come into effect since the drafting of these policies. The CIL economic viability study will provide an even more up to date picture, using the existing suite of policies including sustainable construction.</p>	<p>No change</p>

<p>0057 Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership Northern)</p> <p>0057 Hallam Land Management Ltd (via Barton Willmore Planning Partnership Northern)</p> <p>0057 Templegate Developments (via Barton Willmore Planning Partnership Northern)</p>	<p>Targets of 5- 50% are inappropriate, as some sites will not be able to support any AH provision at all. Para 182 of the NPPF requires that plans should be justified, based on proportionate evidence. The SHMA does not include reference to a 50% target.</p>	<p>The evidence base for the policy is the EVA (2010), the SHMA (2011) there is also evidence that schemes have been negotiated at the 5% level. The current interim affordable housing target has reduced the affordable housing requirement in certain areas (city centre and inner areas) from 15% to 5% to assist viability.</p>	<p>No change</p>
<p>5672 MFS Land Ltd</p>	<p>5-50% targets too high, as overdependence on brownfield sites. The Economic Viability Assessment (2010) found that in the city centre, inner and outer area where most brownfield sites will be achieved there is an over dependence on brownfield sites.</p>	<p>As above. Sites are identified in the SHLAA, to demonstrate sufficient housing to meet the needs of the city.</p>	<p>No change</p>
<p>2663 Spawforths 2663 Miller Strategic Land (via Spawforths)</p>	<p>Agree that updates are undertaken through AMR's. Also support the element of the policy regarding viability appraisals and viability led planning applications. A robust housing needs and market assessment should inform of the need for AH through to sub areas.</p>	<p>Noted. Updates of benchmark figures are carried out on an annual basis and updates of need periodically.</p>	<p>No change</p>
<p>Targets</p>			
<p>0057 Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership Northern)</p> <p>0057 Hallam Land Management Ltd (via Barton Willmore Planning Partnership Northern)</p> <p>0057 Templegate Developments (via Barton Willmore Planning Partnership Northern)</p>	<p>On unviable sites, affordable housing should be considered on a site by site basis on the basis of economic viability risks to delivery, finance available, need to provide economic returns to willing landowners and developers and an up to date SHMA.</p>	<p>Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met and provision be reduced accordingly.</p>	<p>No change</p>
<p>0092 Home Builders Federation</p>	<p>The policy introduces a very broad range of affordable housing targets, the Council has not assessed what impact these ranges might have on viability of developments in particular the specific housing market areas of the district and in combination with other policies specified in the CS such as</p>	<p>An economic viability assessment has been carried by DTZ. This demonstrates that 50% can be achieved. Some account has been</p>	<p>No change</p>

	20% increase in Part L of the Building Regulations, which is contrary to the NPPF (para 174 & 177 requiring that costs of any local requirements be added and assessed at the plan making stage to ensure that these are viable and will not impede delivery). The Council is relying on site-based viability assessments in order to avoid the need to properly assess the cumulative impact of its plan policies on development. Object to site by site basis viability assessment. If there is doubt regarding targets then a lower target should be set. The economic viability assessment 2010 states that certain areas cannot support any AH, plans need to be deliverable.	taking of existing policies to include affordable housing. A CIL economic viability study (Oct 2012) will further assesses the cumulative impact using the existing suite of core strategy policies including sustainable construction.	
0106 Aberford Parish Council	5-50% would like to see a more detailed explanation for this, specifically whether this range of target relates to site location, site size or other criteria. Otherwise this target seems meaningless.	The evidence is derived from the Economic Viability Assessment (EVA) 2010. The EVA outlines that targets of 50% should be achievable in certain areas in certain market conditions. The Core Strategy is for a long time period but the detail will be set out in SPD as this can be responsive to up to date evidence. Until such time the current thresholds will apply as set out in the interim affordable housing policy. By doing this, a flexible approach to delivery will be achieved.	No change
0420 Caddick Developments (via White Young Green Planning)	Recent evidence base for AH has demonstrated percentages below the range defined in this policy. The CS does not provide a clear policy context through an evidence base for affordable housing targets up to 50%.		
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	5-50% target should set actual figure, contrary to NPPF. A robust housing needs and market assessment should inform the need for AH, which should reflect the local housing market sub areas.		
5867C/o Hileys Solicitors (via LDP Planning)	Welcome wording of policy as allows viability assessments to be undertaken at application stage as deviations in what individual sites can accommodate. 50% is higher than now and supposedly justified by DTZ report. Undue burden should not be placed on developers to prove unviable. Table 7.3 of DTZ report can be as a standard in SPD, along with a viability assessment if not consider 50% unsound.		
Thresholds			
0466 Savills	The threshold of 10-15 provides no certainty for developers as to whether a small site will need to comply or not, not what criteria are to be used in assessing which threshold is to apply.	The Core Strategy is for a long time period but the detail will be set out in SPD as this can be responsive to up to date evidence.	No change
2956 Cllr Thomas Leadley	10-15 threshold does not do as much as it could to maximise AH and is unsound.	A threshold below 10 was considered too low by the EVA (2010)	
4825 Morley Town Council	Policy is unsound as sets thresholds below which no AH liability. Rates should be maximised by raising a cash levy against all dwellings even 1. Accumulation of levy to small settlements may be the only way that smaller settlements get		

	AH, to match with CIL.		
SPD			
0092 Home Builders Federation	SPD should not set out requirements for AH on a regular basis, this is unsound, adds delivery burden and is contrary to the NPPF.	The Core Strategy will set out the overall policy and scale of requirement which has been subject to viability testing. But the detail will be set out in a SPD, as this can be responsive to up to date evidence on housing markets, need for AH and the viability of delivering the targets. By doing this a flexible approach to delivery will be achieved. Until an SPD is approved the current interim affordable housing policy will remain in use. The interim affordable housing policy has been welcomed by the housing industry and reflects a flexible approach in responding to changing economic conditions.	No change
2663 Spawforths 2663 Miller Strategic Land (via Spawforths)	Targets should not be delegated to the SPD as is contrary to NPPF.		
5034 Evans Homes No2 Ltd	Due to devolvement to the SPD, thresholds and targets remain far reaching in range with little indication as to the likely requirements, and is difficult to interpret without further guidance. Delays in the SPD would mean no local guidance and provision to be determined through the planning application process. A CS policy which provides clear guidance, informed by an economic viability, to include an exceptions test relating to viability and feasibility on site.		
5121 Directions Planning	Unacceptable that the SPD set thresholds, targets, and mix, this should be set through the Core strategy. NPPF changes the role of SPD and this should be reviewed in light of NPPF. The policy should be reviewed in light of the NPPF.		
5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning)Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates (via ID Planning) 5671 Worthlea Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes	The Council seeks to alter on a regular basis the requirement via an AH SPD. Para 153 of the NPPF informs SPD should not be used to add further burden to delivery and written in its current form the policy adds unnecessary burden.		

(Yorkshire) Ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning)			
5681 Meadowside Holdings LTD 5681 The Diocese of Ripon and Leeds 5681 Lady Elizabeth Hastings Estate Charity 5681 AR Briggs and Co 5681 The Bramham Park Estate	Flexibility is required over the Core Strategy period as the policy recognises needs and market conditions may vary over time. Detailed matters be deferred to a SPD which may be reviewed on an annual basis.	Support	No change
0057 Ashdale Land & Property Company Ltd (via Barton Willmore Planning Partnership Northern) 0057 Hallam Land Management Ltd	Supportive of an SPD which would 'provide up to date guidance on targets and provision sought, which may vary depending on the local area'.	Support	
Combined CIL and AH policy			
0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Barrats Leeds (via Dacre Son & Hartley) 0480 Warner (via Dacre Son & Hartley) 0480 Kebbell (via Dacre Son & Hartley) 0480 Barrett York (via Dacre Son & Hartley) 0480 Keyland (via Dacre Son & Hartley) 0480 Miller (via Dacre Son & Hartley) 0480 Redrow (via Dacre Son & Hartley) 0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Chatford (via Dacre Son & Hartley) 0480 Mirfield (via Dacre	The policy requirement of Affordable Housing be linked into a combined CIL and Affordable Housing Policy to be addressed in full in the Core Strategy.	CIL is subject to special regulations set outside of the Development Plan Process. Given the complexities around both CIL and AH it is difficult to combine both. The Council is preparing a CIL charging schedule which will take into account affordable housing policy, given the complementary nature of CIL and affordable housing.	No change

<p>Son & Hartley) 5671 Great North Developments Ltd (via ID Planning) 5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning)Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates (via ID Planning) 5671 Worthlea Estates Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes (Yorkshire) ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning)</p>			
<p>Positive Planning for AH</p>			
<p>0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Barrats Leeds (via Dacre Son & Hartley) 0480 Warner (via Dacre Son & Hartley) 0480 Kebbell (via Dacre Son & Hartley) 0480 Barrett York (via Dacre Son & Hartley) 0480 Keyland (via Dacre</p>	<p>Suggest Policy informs of a need to plan positively in a manner that addresses the need to deliver more AH across the district using as many traditional and innovative ways as possible.</p>	<p>Affordable housing is delivered thorough planning applications by section 106 and initiatives led by the Housing arm of the Council. The need to plan positively and be responsive to the traditional and innovative ways of maximising affordable housing is a priority.</p>	<p>No change</p>

<p>Son & Hartley) 0480 Miller (via Dacre Son & Hartley) 0480 Redrow (via Dacre Son & Hartley) 0480 Taylor Wimpey (via Dacre Son & Hartley) 0480 Chatford (via Dacre Son & Hartley) 0480 Mirfield (via Dacre Son & Hartley) 5671 Great North Developments Ltd (via ID Planning) 5671 Consortium of Housebuilders Ltd (via ID Planning) 5671 Housebuilders Consortium 5671 Barratt David Wilson (via ID Planning)Homes 5671 Robert Ogden Partnerships Ltd (via ID Planning) 5671 ELE Northern Quarant Consortium (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates (via ID Planning) 5671 Worthlea Estates Estates (via ID Planning) 5671 Edmund Thornhill, Thornhill Estates 5671 Redrows Homes (Yorkshire) ltd (via ID Planning) 1186 T G M F Emsley (via ID Planning) 5895 Barratt David Wilson Homes Yorkshire Homes</p>			
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Specialist housing			
0420 Leeds Trinity University College (via White Young Green Planning).	Student accommodation which responds to specialist need should be exempt from AH and this should be referenced in the policy.	Noted. Purpose built student accommodation not falling into the C3 category is exempt from affordable housing given the nature of the accommodation	No change.
1935 McCarthy & Stone	Elderly specialist housing as referenced in the recent M Ball report, should be given similar status as affordable housing.	This is covered by policy H8.	No change
5105 Renew	Low cost housing should be part of the mix and address affordability. Equity stake housing should be AH.	Low cost cannot be considered as AH in accordance with the NPPF for planning purposes. The NPPF allows scope for shared equity to be considered as affordable housing.	No change
Affordable rent /tenures			
0420 Harrow Estates (via White Young Green)	Fails to adequately address affordable rent (submarket rent) category. RSL's are unduly restricted in their investment decisions by LA's.	The City Council wants to clarify the types of affordability in relation to household incomes. Within this framework different forms of AH such as affordable rent can be provided.	No change
5105 Renew	Support policy in relation to target related to income levels. Support scope for SPD to address types of AH provision are affordable to bottom decile and lower quartile. .	Support.	No change
5121 Directions Planning	Quartile and decile earnings inappropriate terminology.	Terminology reflects income brackets and is useful for understanding the lower income brackets.	No change
Empty properties/brownfield			
0023 Otley Conservation Task Force	Encourage town centre property owners to adopt 'Living over the shop' LOTS as a means of creating affordable housing, in market towns and town centres such as Otley. In conservation areas use of empty brownfield sites to create terraces.	Dealt with by policies P2 and P3, creating affordable dwellings would be reliant upon other sources of funding.	No change

Use of alternative site/self build			
0062 Leeds Civic Trust	Suggests allowing for provision, tied to the permission, on alternative sites where the need is greater. Include alternative methods of provision through encouraging similarly subsidised mutual self build schemes.	The NPPF cautions that agreements for off site housing provision need to contribute to the objective of creating mixed and balanced communities.	Minor changes 1. Amend policy to include 'affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified. 2. Insert 'normally' the policy ie. Housing developments above a certain threshold should include a proportion of affordable housing to be normally provided on the development site.
Object to AH and reliance on private tenures			
2527 Leeds Residential Property Forum	Private tenures should not support the provision of social housing, adds to cost and makes development unviable. Private rented sector is having to provide for the less well off in society. Govt should bring in institutional investment. 'low cost' is ambiguous, and should be exempt from rent market housing.	The need for Affordable housing is acute, based on evidence set out in the SHMA 2011.	No change.
No provision for off site provision			
5696 Inner NW Area Committee Planning Sub group	The policy is unsound as it does not allow scope for the provision of AH off site or for contributions to be made in certain cases. Policy is contrary to NPPF	Agree	Minor changes 1. Amend policy to include 'affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified. 2. Insert 'normally' ie. Housing developments above a certain threshold should include a proportion of affordable housing to be

			normally provided on the development site.
Supportive of provision of AH			
5121 Directions Planning	Supportive of the provision of AH in order to create a balanced community and suitable housing for all types of housing need.	Support	No change
Support policy			
5681 The Hatfield Estate 5681 Meadowside Holdings LTD 5681 The Diocese of Ripon and Leeds 5681 Lady Elizabeth Hastings Estate Charity 5681 AR Briggs and Co 5681 The Bramham Park Estate	It is important that the Core Strategy seeks to meet all housing needs and demands, policy provides an appropriate policy hook.	Support	No change

Appendix 2. Proposed changes to Core Strategy.

Affordable Housing

- 5.2.11 In conformity with national policy guidance, affordable housing will be required to meet local needs. The policy has been informed by the evidence base, including the Leeds Strategic Housing Market Assessment (Update 2011) (as referred to in PPS3, Annex C) and the Economic Viability Assessment 2010 (in accordance with PPS3 Para 29).
- 5.2.12 Since affordable housing planning policy was first developed in the early 1990s, Leeds has always been able to demonstrate a need for affordable housing (UDP paras 7.5.14 – 19, Assessment 2001/02, Assessment 2003, Assessment 2007 and Assessment 2011). Following national practice guidance, need for affordable housing was calculated to be 480 per annum 2003 and 1889 per annum in 2007. The most recent Strategic Housing Market Assessment (2011) identifies an annual need of 1158 affordable housing dwellings. Not all of this need will be met by the planning system, other methods of delivery such as grant funded schemes also play an important role in the delivery of affordable housing.
- 5.2.13 The Economic Viability Assessment 2010 explored what percentages of affordable housing and what mixes for example social rented /sub-market types of affordable housing would be viable. It did this for different geographical areas of Leeds and for different states of the market, firstly baseline (the depressed period of 2010), secondly mid point and thirdly height of the Market (2007). It concludes that in periods of buoyancy affordable housing could be delivered at 50% in high value areas but that in periods of adversity some areas are hardly able to sustain any affordable housing.
- 5.2.14 Affordable housing should meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and house prices. It should include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.
- 5.2.15 Households vary in their ability to afford housing. The Strategic Housing Market Assessment 2011 (SHMA) uses evidence of household earnings combined with forecast growth in different types and sizes of household to assess affordability. The profile of earnings in Leeds is polarised and this is forecast to continue with growth in well paid professional and managerial jobs on the one hand and growth in low paid sales, service and elementary occupations on the other whilst the growth in medium paid occupations is predicted to be modest. This means there will continue to be a large proportion of households in Leeds that can afford very little. The SHMA concludes that 60% of affordable housing should be of the “social rented” type. Given changes in national definitions and funding for affordable housing, it is possible that the definition “social rented” as very low rent housing may be blurred with the meaning of “affordable rent”. As such it is important that the Core Strategy clarifies what is meant by different levels of affordability so that identified needs are met.

5.2.16 The SHMA suggests that households need earnings of at least £15,000 to afford more than “social rented” housing. This equates to approximately the lowest decile of earnings in Leeds. The affordability of affordable housing should be designed to meet identified needs of households in both lower quartile and lower decile bands of earnings. From an initial starting point of 40% of affordable housing to meet needs of households in lower quartile earnings and 60% lower decile earnings, an SPD will advise how these percentages may vary in different areas of Leeds and may vary over time as new evidence emerges.

5.3.17 Policy H5 provides an overall framework for the provision of affordable housing. It is appropriate that details such as thresholds and targets is provided through a Supplementary Planning Document. This will reflect market conditions and can be reviewed as economic conditions change and the life of the Core Strategy within the context of Policy H5.

POLICY H5: AFFORDABLE HOUSING

Housing developments above a certain threshold should include a proportion of affordable housing to be normally provided on the development site. The affordable housing provision should provide for a tenure mix in terms of submarket and social rented housing. Over the plan period to 2028 the threshold, amount of affordable housing and tenure splits may vary depending on housing needs and market conditions applicable at the time. An Affordable Housing Supplementary Planning Document will therefore provide up to date guidance on targets and provision sought, which may vary depending on the local area. An annual update to the SPD of affordable housing price benchmark figures will also be provided.

The broad range of provisions will be:

- i) A threshold between 10 and 15 dwellings will apply – affordable housing will be sought on any development at or above the threshold. There is no site size threshold.
- ii) Overall targets for affordable housing will vary from 5 to 50%.
- iii) Affordability of affordable housing to be designed to meet identified needs of households as follows;
 - 40% affordable housing for households on lower quartile earnings
 - 60% affordable housing for households on lower decile earnings

During the Core Strategy plan period, Affordable Housing SPDs will determine what particular thresholds, targets and affordability mix will apply to which areas of Leeds.

The affordable units should be a pro-rata mix in terms of sizes and types of the total housing provision, unless there are specific needs which indicate otherwise, and they should be suitably integrated throughout a development site.

Applicants may choose to submit individual viability appraisals to verify that the affordable housing target cannot be met. In such cases, affordable housing provision may be reduced accordingly.

Affordable housing provision should be on site, unless off site provision or a financial contribution can be robustly justified.

Elderly persons sheltered housing and low cost market housing should not expect the requirement for affordable housing to be automatically waived or reduced, although individual viability appraisals will be taken into account.

Secure arrangements in the form of S106 agreements, must be agreed to ensure delivery and that affordability embodied within affordable housing is maintained for future people of Leeds in housing need.