

BANES Core Strategy Examination
Written Statement Issue 4

- 1.0 Is policy CP 9 justified in seeking an average of 35% affordable housing on development of 10 dwellings and more? Given the range of market values across the district is a single % figure the most appropriate approach?**
- 1.1 We do not challenge the fact that there is a need for a significant amount of affordable housing – this is one of the reasons why we suggest that BANES housing requirement should be increased towards that envisaged in the RS. We are not convinced however that a fixed percentage target is either appropriate or viable.
- 1.2 Whilst we have considered the Council’s Viability Assessment CD4/H8, we do not believe that its approach demonstrates that a fixed percentage requirement will be suitable on all sites.
- 1.3 Our original representations pointed out a number of reasons why 35% affordable housing may not be appropriate on an urban extension to the south east of Bristol. There is however an underlying principle that any S106 obligations should only be sought where they are viable and for a wide range of issues this is only likely to be properly tested on a site specific level at a given point in time. This concept is not new and there is extensive guidance (from the HCA and others) to inform the preparation of site specific viability testing.
- 1.4 The deliverability of the plan’s housing allocations must be brought into question if the Core Strategy does not include sufficient flexibility to ensure affordable housing requirements remain viable on a site by site basis.
- 1.5 In the case of large housing or mixed use development there is also a need to take into account:
- the costs of significant infrastructure provision and the reasonableness of the overall S106 obligations;
 - the impact that too high a requirement may have on place making and the degree to which it properly reflects a mixed and balanced community. Our original representations

pointed out that the proportion of social rented dwellings in Bristol was 22.5% and we suggested that the target for urban extensions to Bristol should not exceed 25%.