



Kirklees Local Plan Examination Stage 1 – Initial Hearings

Matters, Issues and Questions (MIQs)

1.0 INTRODUCTION

- 1.1 This statement has been prepared by WYG on behalf of the Church Commissioners for England (herein referred to as “our client”) who have an interest at Leeds Road, Chidswell. By way of reference, our client’s land is referred to as *Land East of 932-1110 Leeds Road, Shawcross/Woodkirk, Dewsbury* (Draft Allocation Reference MX1905).
- 1.2 Our client’s site has been identified to deliver 1,535 dwellings, and 122,500sqm of employment development during the Plan period. They are therefore very keen to engage and assist in the preparation of a sound Local Plan which is positively prepared, justified, effective and consistent.
- 1.3 This response seeks to address the key issues to be discussed at the forthcoming Kirklees Local Plan Examination Stage 1- Matter 3 Overall Housing Need.
- 1.4 The response is structured such that it follows the questions posed in the Matters and Issues agenda and should be read in conjunction with the representations by WYG on behalf of our client to the Publication Draft Local Plan in December 2016.

2.0 MATTER 3 – OVERALL HOUSING NEED

Issue – Is the identified objectively assessed need of 31,140 dwellings soundly based and supported by robust and credible evidence?

a) Does the identified Kirklees Housing Market Area provide a robust and appropriate basis for assessing housing needs?

- 2.1 The NPPF advises at paragraph 158 that a Local Plan should be based on adequate, up-to-date and relevant evidence. Local authorities are also advised that assessments of and strategies for housing, employment, and other uses are integrated, and that they take full account of relevant market and economic signals.
- 2.2 In the case of housing, paragraph 159 of the NPPF states that local authorities should have a clear understanding of housing needs in their area. They should therefore prepare a Strategic Housing Market Assessment to assess their full housing needs.
- 2.3 The PPG also includes a guide on assessing need and advises on the scope of assessments (see Paragraph 008– Reference ID: 2a: 2a-008-20140306). In this case the PPG advises that needs should be assessed in relation to the relevant functional area, i.e. the housing market area, with the primary objective including identifying the future quantity of housing needed (paragraph 002 Reference ID: 2a-002-20140306).

What is the evidence base?

- 2.4 The PDLP is supported by Kirklees’ Strategic Housing Market Assessment, October 2016 (SHMA 2016).

What is Kirklees’ Housing Market Area?

- 2.5 Paragraph 3.10 of the SHMA (2016) sets out that the housing market geography of Kirklees is complex and intrinsically linked with that of the wider Leeds City Region. Paragraph 3.12 of the SHMA states that within the SHMA, the following three Local Housing Market Areas are identified:



- Huddersfield (extending to the north into part of Calderdale);
- Dewsbury and Mirfield (extending north into South Leeds); and
- Batley and Spennings (extending north into Bradford).

Does this provide a robust and appropriate basis for assessing housing needs?

- 2.6 Whilst the SHMA acknowledges that the northern boundaries of Kirklees experience and share relationships with other areas, the SHMA states that "*these relationships are not considered to be of sufficient scale or significance to warrant the formulation of new individual market areas or require the sub-division of Kirklees for policy making purposes.*"
- 2.7 The SHMA states that an analysis of the 2011 Census migration data suggests that 72.7% of households move within Kirklees area and 66.8% of residents in employment, work within the District. Therefore, whilst Kirklees is part of a wider functional economic area, which is focused on Leeds, Kirklees exhibits a high degree of self-containment in terms of migration.
- 2.8 This conclusion is supported by the 2015 Household Survey which found that of those that had moved home in the preceding five years, 78.3% originated within Kirklees. It also found that 76.9% of households planning to move in the next five years intend on remaining in Kirklees.
- 2.9 Therefore, based on the supporting evidence referred above the SHMA states that Kirklees is a "*self-contained Housing Market Area for the purposes of Local Plan policy making.*"
- 2.10 It should also be acknowledged that all constituent authorities within the Leeds City Region are looking to fully meet their Objectively Assessed Housing Needs within their own area.

Overall

- 2.11 Therefore, the response to the question is **Yes**, because the SHMA has sufficiently demonstrated that Kirklees is a self-contained Housing Market Area for the purposes of Local Plan policy making. Kirklees is also looking to fully meet its own Objectively Assessed Housing Needs in its own area.
- 2.12 Therefore, this provides a robust and appropriate basis for assessing housing needs.

b) Do the demographic based projections in the Council's Strategic Market Housing Assessment (SHMA) (2016) (SD18) provide a suitable starting point for establishing objectively assessed housing need (OAHN)?

- 2.13 The PPG acknowledges that "*establishing future need for housing is not an exact science (paragraph 14, Reference ID 2a-014-20140306).*" Paragraph 015 (Reference ID: 2a-015-20140306) of the PPG states that in preparing the evidence base, household projections published by the DCLG should provide the starting point for assessing overall housing need.
- 2.14 Paragraph 159 also advises that 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 the population projections, taking account of migration and demographic change.



The SHMA (2016) (SD18)

- 2.15 Paragraph 6.13 of SD18 states that the latest official population and household projections (2014 based) have been used in accordance with the PPG, paragraph 16 (Reference ID:2a-016-20150227), as well as paragraph 158 of the NPPF.
- 2.16 Paragraph 6.13 of the SHMA (2016) states that over the 2013-2031 Plan period, the 2014-based household model suggests an increase of 27,321 households, which equates to 1,584 dwellings each year.

Overall

- 2.17 Therefore, the response to the question is **Yes**, because the SHMA, as an evidence base for the Local Plan, is adequate, up-to-date and relevant.

c) Is the applied jobs growth uplift rate (based on projected growth of 23,000 jobs over the Plan period) soundly based and justified? In particular:

- **Are the economic assumptions underpinning this forecast, namely a 75% employment rate and 4.5% unemployment rate, achievable by 2031?**
- **Why was the jobs growth SENS1 scenario used instead of the CORE scenario? How does this fit with the aim in the Plan and the Council's Economic Strategy (LE6) of achieving a 75% employment rate over the Plan period?**

[There is some overlap between Matter 3 and Matter 6 on economic matters. This question is included in this section in order to allow discussion on the link between housing and jobs]

- 2.18 Paragraph 018 (Reference ID: 2a-018-20140306) of the PPG advises that plan makers should assess the likely change in job numbers based on past trends and/or economic forecasts, as well as having regard to the growth of the working age population in the housing market area.

Economic Assumptions

- 2.19 Paragraph 6.24 of SD18 states that a series of jobs-led scenarios were prepared using the 2012-based projections, with a further jobs-led (July 2016) scenario prepared used the 2014 based projections. This assumed a full-time equivalent jobs growth of 23,197 for the 2013 to 2031 period.
- 2.20 The 75% employment rate and 4.5% unemployment rate stem from evidence contained in The Employment Technical Paper (April 2017) (SD22) and Kirklees Economic Strategy (KES) (LE6).
- 2.21 Paragraphs 4.1 to 4.31 of SD22 sets out the Council's approach on economic forecasting with the OAN, which is summarised in Table 1 (Economic forecast for "KES objectives and 75% employment rate").
- 2.22 Of note are paragraphs 4.15 to 4.17 of SD22 which considered the timescales for seeking to meet the objectives of achieving a 75% employment rate by 2020, which is one of the KES objectives. Paragraph 4.15 to 4.18 state:

4.15 Following a review of the KES objectives it was concluded that delivering an additional 3,500 jobs in manufacturing and achieving both a 75% and 80% employment rate by 2020 was overly aspirational and therefore considered unrealistic. Although the original forecast for the Draft Local Plan was a direct interpretation of the Kirklees Economic Strategy (KES) objectives, the delivery of



the KES' stated targets would require employment land to be made available immediately to achieve the targeted employment rates by 2020.

- 4.16 *The earliest reasonable date the Local Plan could be adopted by is late 2017 early 2018, leaving 2 years at best for the strategic employment sites to be built out and fully occupied. It is recognised in the KES that the delivery of high quality employment land and 'landmark industrial sites' will be required if the strategies stated objectives are to be achieved. Therefore it was concluded that the land could not be made available within the required timeframe. In view of this it was felt more prudent, and realistic, to extend the stated target date to the end of the plan period (2031).*
- 4.17 *Moving towards a more realistic timescale for delivery of the key employment sites has helped to ensure a more steady and sustainable rate of employment growth whilst still working towards achieving the overarching objectives of the KES. This change in rate of employment growth will naturally affect the overall jobs need and has consequently necessitated the need to remodel the economic forecasts for the Local Plan.*
- 2.23 Paragraph 4.29 of SD22 states the council acknowledges that resultant jobs growth will be challenging, however, based on historical employment rates (see Appendix 2 of SD22) it is still considered achievable.
- 2.24 Having reviewed the steps undertaken and evidence presented in SD22, we believe that that the 75% employment rate and 4.5% unemployment rate, which form part of wider economic objectives that underpin this Local Plan, are achievable by 2031.

SENS1 Scenario

- 2.25 Paragraphs 4.32 to 4.39 of SD22 sets out the Council's jobs led scenario approach. It notes at paragraph 4.35 that:
- "A series of 'jobs-led' sensitivity ('SENS1') scenarios have been produced. Each of these sensitivity scenarios maintains a higher overall economic activity rate (relative to the equivalent core scenarios) and includes a further small reduction in the employment rate."*
- 2.26 We believe that the justification presented in paragraph 4.38 of SD22 is sound, and, for ease of reference are as follows:
- *The successful implementation of the Kirklees Economic Strategy which is acknowledged as one the main strategic drivers for the Local Plan underpinning its spatial vision, objectives and spatial development strategy (along with the Health and Wellbeing Strategy) not only increases job numbers but also brings more Kirklees residents into employment rather than increasing in-migration.*
 - *The Kirklees employment rate is low but improving and is below the Leeds City Region average - there is therefore an ambition set out in the Kirklees Economic Strategy to address the employment rate within the Kirklees population as far as reasonably possible, compared to the core scenarios, rather than subtracting from the efforts of other authorities within the functional economic market area to retain or increase their own employment rates.*
 - *The Kirklees Economic Strategy identifies a key weakness of the Kirklees local economy which need addressing concerning the skills/wages polarisation between certain parts of the district resulting in high skills/high wages for some and low incomes or worklessness for others – it is therefore vital to make local employment opportunities available for Kirklees residents as far as reasonably possible, compared to the core scenarios.*
 - *The Kirklees Economic Strategy contains a headline initiative for an action*



programme to (which includes the Local Plan as well as other key strategies, plans and programmes) to enhance enterprise, skills and opportunities for young people - to maximise their economic contribution and reduce unemployment. Increasing the number of opportunities for Kirklees residents for apprenticeships and to address skills issues as far as reasonably possible, compared to the core scenarios is vital and also shows greater alignment with Leeds City Region Skills Plan.

Overall

- 2.27 Therefore, Sens1 fits with the Council's Economic Strategy of achieving a 75% employment rate over the Plan period, which we support.

g) Is there a need for any adjustments to OAHN in light of Brexit?

- 2.28 There is no credible evidence to soundly consider the impact of Brexit, and given the ongoing uncertainty on the issue we do not believe that it is reasonable to do as part of this examination.
- 2.29 Therefore, we do not believe there is a need to make any adjustments in light of Brexit.