



# **Kirklees Local Plan Examination**

## **Stage 1 – Initial Hearings**

### **Hearing Statement**

**Submitted on behalf of Upper  
Dearne Valley Environmental  
Trust (registered charity number  
1157540)**

**Matter 4 - Housing land supply  
and delivery**

**September 2017**

## **Matter 4 – Housing land supply and delivery**

### ***Issue – Is the identified overall housing requirement in the Plan (31,140 dwellings) justified, deliverable and consistent with national policy?***

1. The Upper Dearne Valley Environmental Trust has already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, the Upper Dearne Valley Environmental Trust wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Upper Dearne Valley Environmental Trust also wish to speak at the hearing in relation to Matter 4.
2. Matter 4 – question (a) and (b)
  - 2.1 The Upper Dearne Valley Environmental Trust do not consider that the Objectively Assessed Housing Requirement in the Local Plan (31, 140) is justified, deliverable or consistent with national policy.
  - 2.1 The Upper Dearne Valley Environmental Trust do not consider that the identified housing needs are based on objectively assessed development requirements. They are based on purely theoretical projections and interpretations which are not reliable.
  - 2.2 The housing target set out within the draft Local Plan represents a 500% increase on actual completion rates in Kirklees since 2013 and the Upper Dearne Valley Environmental Trust do not believe that it is deliverable.
  - 2.3 The Upper Dearne Valley Environmental Trust believe that the Objectively Assessed Housing Need is already aspirational and not realistic or deliverable.
  - 2.4 The Upper Dearne Valley Environmental Trust certainly do not believe that the housing requirement should be expressed as a minimum as it is totally unrealistic and undeliverable.
  - 2.5 The Upper Dearne Valley Environmental Trust considers that there has been an over estimation of the objectively assessed housing need; an under estimation of the brownfield land supply; an over estimation of the necessity for green field land allocation; an over estimation of the necessary industrial land allocations and; an over estimation of the necessary Green Belt land release.
3. Matter 4 – question (d)
  - 3.1 The Upper Dearne Valley Environmental Trust believe that the Objectively Assessed Housing Need should look at need v. demand and it does not.

- 3.2 New housing which is being built currently in the Dearne Valley is not selling well resulting in developers having to offer many incentives in order to sell the housing.
- 3.3 The Local Plan needs to be segmented by type and tenure of housing. This should follow through from the objectively assessed housing need to housing requirement – land supply – and monitoring. Without this the Local Plan will fail and real housing needs will not be met – there will still be a housing shortage. Furthermore, Kirklees have poor record of achieving affordable housing numbers so appropriate housing fails to be built. This is not satisfactorily addressed within this Local Plan.
- 3.4 Any large proposed allocation within the Local Plan should only come forward as part of its own development plan which should be developed in genuine consultation with those in the local community, this will ensure that areas get what is needed, especially in view of the lack of Neighbourhood Plans within Kirklees.