

GEORGE F. WHITE



SITE H49a: MATTER FIVE
MATTERS, ISSUES AND QUESTIONS
4TH SEPTEMBER 2017

HELEN BOSTON

1.0 **Introduction**

- 1.1 George F. White (Planning and Development) are instructed by Mr John Lund ('the Site Owner'), Site H49a (Land adjacent Brick Hill Farm, Oddfellows Street, Scholes, Cleckheaton) to submit representations to the Kirklees Local Plan; Stage 1 Matters, Issues and Questions, 10 July 2017.
- 1.2 The publication of the plan and the need to accommodate the new homes and jobs, within Kirklees up to 2031, is strongly supported.
- 1.3 In responding to the Matters, Issues and Questions Document, we have considered each of the questions and make representations only to those considered relevant at this time. We would also like to rely on the submissions to date, which for ease of reference has been appended to this submission.
- 1.4 We welcome the opportunity for further engagement and the opportunity to appear at the Examination in Public.
- 1.5 We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.6 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2.0 **Matter 5 – Other housing requirements**

Issue – Have affordable housing needs, traveller accommodation needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy?

Policies PLP 11, 12

3.0 Questions

Affordable housing

- a) Has the need for affordable housing been adequately assessed in the SHMA?
- b) What is the total net need for affordable housing over the Plan period? Should the Plan contain specific reference to this figure?
- c) What is the expected rate of affordable housing delivery over the Plan period? Will there be a shortfall against need? Should an affordable housing trajectory be included in the Plan?
- d) Is the proposed rate of 20% affordable housing (on sites of more than 10 units) supported by the Council's viability evidence, in terms of both market housing schemes and developments with self-contained units designed for retirement living and people with specific accommodation needs?
- e) What affordable housing percentage rate has been achieved in recent years in schemes across the borough?
- f) Does the Plan provide a clear definition of affordable housing which accords with national policy and reflects the Government's proposals in relation to Starter Homes? Is the Council's proposed modification SPMM28 necessary to ensure the Plan is sound?
- g) Is the approach to rural exception housing in Policy PLP 11 clearly expressed in terms of the scale, type and location of affordable housing sought, and consistent with national policy?
 - Is the application of the policy to 'small free-standing settlements' justified? Are the Council's proposed modifications SPMM15 and SPMM17 necessary to ensure that the policy is sound?
 - Would provision be limited in scale?
 - Is the policy sufficiently flexible regarding the type of affordable housing on rural exception schemes?
 - Does the policy take account of Government proposals in relation to Starter Homes?

3.1 Whilst we have no response to the direct questions, instead we would like to rely on the Council's technical ability to access the affordable housing requirements in their district.

- 3.2 We would however like to share our support for the proposed percentage of affordable housing contribution. Other Authorities, in an attempt to meet their identified affordable housing needs have set a higher level of affordable housing, upwards of 40 - 50%. It is our opinion that, whilst this is proposed to support affordable housing, this is often a detriment to it, having a negative impact on the delivery of affordable housing.
- 3.3 Where contributions are set at a high percentage this often acts as a deterrent to developers who in a best case scenario are forced to argue viability for a reduced rate/ delivery. This takes time, often going through the appeal process and even the courts, delaying the deliverability of new homes. The worst case scenario is that developers are discouraged from developing within the district, resulting in not only less affordable homes but the overall delivery of homes.
- 3.4 In our view, more affordable housing is likely to be delivered across the district if overall delivery is increased even with a lower policy percentage requirement.
- 3.5 Based on the Councils proposed policy, Site H49a, would provide (approximately) 9.8 affordable dwellings.

Travellers

h) Is the assessment methodology in the Council's Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015) (GTAA) (LE16) justified, effective, robustly based and in line with national policy? Specifically:

- **Is there evidence of overcrowding on existing travellers sites, and how has this been taken into account? (for example, households with insufficient or cramped living accommodation, or 'doubling-up' on a pitch with more than the permitted number of caravans being present)**
- **Is the assumption that 5.6% of current gypsy and traveller households living in bricks and mortar may plan to move to a traveller site in the next five years justified and based on robust evidence?**
- **Are the assumptions relating to the number of gypsy and traveller households likely to emerge from bricks and mortar accommodation in the next five years justified and robustly based? What annual rate of household formation does this represent?**
- **Is the use of household survey data to estimate the number of households arising from current traveller sites in the next five years and over the longer term (to 2033/34) justified and robust? Why was this approach used in preference to average household formation rates? Has account been taken of future household formation from families moving out of bricks and mortar accommodation (including those occupying the allocated pitches)?**
- **Has account been taken of potential migration rates?**

i) Are there any implications from the Government's updated definition of gypsies and travellers, as set out in Planning Policy for Travellers Sites (2015)?

j) What is the total identified need for gypsy and traveller and travelling showpeople sites over the Plan period between 2013 and 2031? Should the need figure be included in the Plan? What is the breakdown of need within this period? What types of sites are required, e.g. public or private?

k) Is the identified need for additional traveller sites deliverable over the Plan period?

- **Will a five year supply of land for gypsies and travellers and travelling showpeople be provided on adoption of the Plan?**
- **Is there evidence that some supply will come forward on windfall sites, taking into account the extent of the Green Belt and other constraints in the borough?**

- **Does the Plan provide sufficient flexibility to deliver the identified need for pitches and plots?**

l) How were potential traveller allocation sites identified and assessed? Did the search focus on particular areas or apply across the borough? Were sites in the Green Belt considered for allocation and for safeguarding?

m) Did cross-boundary/sub-regional work with other authorities help to inform the borough's identified need for transit pitches?

3.6 We have no observations on the above.

Housing mix

n) Is the requirement in Policy PLP 11 to seek a broad mix of housing from all proposals justified and deliverable?

3.7 We agree with the principle of Policy PLP11. The policy approach appears to be appropriate, based on the evidence received from the Strategic Housing Market Assessment.

o) What conclusions does the SHMA reach in terms of the mix of housing size, type and tenure needed in the borough? Should the evidence in the SHMA be used to determine mix in residential schemes, or is there a need to have regard to other sources of information?

3.8 We consider that the SHMA should be the firm basis for guiding the mix of housing size, type and tenure needed in the borough. However, to remain relevant and reliable the SHMA would need to be updated annually. Housing needs are constantly changing and need to be accurately understood to ensure that developers understand the needs and are able to respond accordingly.

3.9 Our only other observation would be that in the SHMA the Council has grouped one and two dwellings together. For clarity we would welcome one and two bedrooms being separated.

p) Is the second paragraph of Policy PLP 11 seeking to impose optional Building Regulations or additional technical requirements relating to accessibility? If so, what proportion of new dwellings should comply with the standards? Is the approach supported by viability work and local evidence on the need for accessible and adaptable dwellings and wheelchair user dwellings?

q) Does the Plan make appropriate provision for the housing needs of older people and other groups in the community?

4.0 **Conclusion**

- 4.1 Whilst the Local Plan will be examined by the Inspector, who will ultimately conclude whether the plan has been prepared with the Duty to Cooperate, legal and procedural requirements and sound. We are satisfied that the Plan the Inspector is being asked to consider is positively prepared and justified, effective and consistent.

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