

Date: 23rd August 2017

Consultee ID: 943892

Matter 5

KIRKLEES LOCAL PLAN EXAMINATION

Matter 5: Other housing requirements

1. The following hearing statement is made for and on behalf of the Home Builders Federation. This statement responds to selected questions set out within Matter 5 of the Inspector's *Matters and Issues*.
2. The Inspector's Issues and Questions are included in bold for ease of reference. The following responses should be read in conjunction with our comments upon the submission version of the Kirklees Local Plan, dated 16th December 2016. The HBF has also expressed a desire to attend and participate in Matter 5 of the examination hearing sessions.

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?

Affordable housing

a) Has the need for affordable housing been adequately assessed in the SHMA?

3. The HBF has no further comments.

b) What is the total net need for affordable housing over the Plan period? Should the Plan contain specific reference to this figure?

4. The SHMA identifies a need for an additional 1,049 affordable homes per annum. It is understood this is based upon reducing the backlog in affordable need in the first five years.

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?

5. This is set out within figure 2 of the *Housing Supply Topic Paper* (exam ref: EX30). This shows anticipated affordable delivery of just over 300 units per annum from 2019/20, or over 17% of the net housing requirement. This is, however, greater than has previously been achieved. Analysis of past delivery (Table 9, EX30) suggests on average less than 14% of completions in any one year are affordable. If this were replicated over the remainder of the plan period it would equate to an annual delivery of 242 affordable units per annum. This is less than a quarter of the requirement identified in the SHMA.

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?

6. No, I refer the Inspector to our comments upon the Publication version of the plan (para 54) which notes that a 20% affordable housing contributions are unlikely to be viable in value areas 4 and 5.

e) What affordable housing percentage rate has been achieved in recent years in schemes across the borough?

7. I refer the Inspector to our response on question 'c' above.

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?

8. The Council and Inspector will note that the Government is proposing to modify the definition of affordable housing within the NPPF. This was raised in the recent Housing White Paper¹. Once changed this will need to be applied in Kirklees.

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?***

¹ DCLG 2017: Fixing our broken housing market

- *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?*

9. No comments.

Housing mix

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

10. The requirement for a broad mix of housing across the plan area is not disputed. The need and demand will, however, vary from site to site and over time. I refer the Inspector to our comments upon the Publication version of the plan, paragraph 51.

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?

11. Whilst the SHMA provides useful context this is primarily a district wide snapshot in time. Needs and requirements as well as market demand will vary over time. The SHMA also cannot and does not take full account of individual aspiration or the economic aspirations of the plan, including the need to attract additional workers and businesses. In this regard it is essential that the SHMA is not taken as being a definitive guide on a site by site basis.

12. Other sources of information will be useful this may include localised needs assessments, site viability and characteristics and market demand.

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?

13. The optional Building Regulations standards relating to accessibility can only be imposed through Local Plan policies where they are supported by appropriate evidence. The types of evidence required are identified within the PPG (ID 56-007). Whilst the SHMA may provide some of this evidence large elements such as

the likely future need, impact on viability and adaptability of the existing stock appear to be missing. In this regard such a requirement would not be justified.

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

14. The HBF has no further comments.

Yours sincerely,

Matthew Good

Planning Manager – Local Plans

Email: matthew.good@hbf.co.uk

Tel: 07972774229