



Kirklees Local Plan

Technical Paper: Housing

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Planning Policy Group
Investment and Regeneration Service
Kirklees Council
PO Box B93
Civic Centre III
Huddersfield
HD1 2JR

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1. Introduction

- 1.1 The National Planning Policy Framework (paragraph 7) sets out three dimensions to sustainable development: economic, social and environmental. Housing delivery is identified as supporting the social role and the economic role of the planning system. In addition, widening the choice of high quality homes is identified as a positive improvement in the quality of the environment arising from pursuing sustainable development (paragraph 9).
- 1.2 National planning policy requires local planning authorities to identify and ensure their local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. The draft Local Plan housing requirement has been identified following analysis of demographic and economic scenarios for Kirklees, set in the Leeds City Region context.
- 1.3 Sites will be allocated to ensure the draft Local Plan housing requirement can be met. The calculation of the amount of land required for housing takes account of factors such as completions since the local plan base date, existing planning permissions, windfall allowance and additional flexibility. A significant number of potential housing sites submitted to the council have been assessed through the draft Local Plan process. The accepted options are set out on the draft Local Plan policies map and rejected options are also shown on a rejected options plan.
- 1.4 This technical paper provides the context related to the housing elements of the draft Local Plan. It provides background information relating to national planning policy, local context, the housing requirement, land supply, site assessment assumptions, phasing and the housing trajectory.

2. National planning context

2.1 The following section sets out key points from the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG) relating to housing.

Housing requirement and affordable housing needs and supply

Housing needs planning context

2.2 NPPF (paragraph 47) identifies measures for local planning authorities to boost significantly the supply of housing including ensuring their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. NPPF (paragraph 159) requires the preparation of a Strategic Housing Market Assessment (SHMA) to assess the full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The SHMA should also identify the scale and mix of housing and the range of tenures the local population is likely to need over the plan period, with consideration of household and population projections. This should enable the local plan to:

- meet household and population projections, taking account of migration and demographic change;
- address the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and
- cater for housing demand and the scale of housing supply necessary to meet this demand.

2.3 NPPF (paragraph 50) sets out measures to deliver a wide choice of high quality homes, widen home ownership opportunities and create sustainable, inclusive and mixed communities including:

- Planning for a mix of housing based on current and future demographic trends;
- Identifying the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and
- Setting out policies for how affordable housing is delivered, including meeting needs on site unless off-site provision or a financial contribution of broadly equivalent value can be justified.

2.4 National Planning Practice Guidance provides more clarity and defines need as “the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period”. It clarifies that this includes catering for the housing demand of the area and identifying the scale of housing supply necessary to meet that demand. NPPG requires assessments of need to be based on facts and unbiased evidence, though local planning authorities may take constraints into account when bringing the evidence base together to identify specific policies within development plans.

- 2.5 NPPG states that local authorities should assess their housing needs working with the other local authorities in line with the duty to cooperate, although it acknowledges that within a larger housing market area, there may be sub-markets with specific features. NPPG does not set out a specific methodology to be followed in identifying housing market area but it refers to three information sources to be considered:
- House prices and house price trends;
 - Household migration and search patterns; and
 - Contextual data, for example travel to work, retail and school catchment areas.
- 2.6 In terms of establishing housing need, household projections published by the government are recognised as the starting point, but these are trend based so do not seek to predict the impact of future government policies, changing economic circumstances or other factors. The guidance requires an assessment of whether housing projections need to be adjusted to reflect relevant market signals such as land prices, house prices, rents, affordability, rate of development and overcrowding.
- 2.7 NPPG requires plans to consider future and current housing trends including the age profile of the population; household composition (e.g. single people, couples, families), existing house sizes (no. of bedrooms) and tenure. Specific types of housing / groups of people that require consideration in needs assessments are: the private rented sector, people wishing to build their own homes, family housing, housing for older people, households with specific needs and student housing.
- 2.8 National guidance states that households considered in affordable housing need include those in insecure tenures, overcrowded households, unsuitable or unfit housing or people with particular social needs. When calculating need for affordable housing a number of factors are to be considered. These include the number of homeless households, those in priority need housed in temporary accommodation, those in overcrowded households or unsuitable dwellings, households from other tenures in need and those that cannot afford their own homes. Newly arising affordable housing need is defined as the number of newly forming households multiplied by the proportion unable to afford market housing. The total need for affordable housing should consider the newly arising need against the total available stock.

Housing supply planning context

- 2.9 NPPF states that local planning authorities should prepare a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period (paragraph 159). NPPG sets out how local authorities should approach assessments of land availability for housing by:
- identifying sites and broad locations with potential for development;
 - assessing their development potential;
 - assessing their suitability for development and the likelihood of development coming forward (the availability and achievability).

- 2.10 In considering the deliverability of sites, paragraph 173 considers plan viability and requires local planning authorities to consider how development will provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 2.11 Paragraph 52 states that the supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns. Local planning authorities should work with the support of their communities to consider whether such opportunities provide the best way of achieving sustainable development.
- 2.12 To maintain the supply of deliverable sites local authorities should (paragraph 47):
- identify and update annually a supply of specific deliverable sites sufficient to providing five years worth of housing against their housing requirements with an additional buffer of either 5% to ensure choice and competition in the market for land, or 20%, where authorities have a record of persistent under-delivery;
 - Identify a supply of specific and developable sites / broad locations for growth for years 6-10 and, where possible, for years 11-15;
 - Set out a housing trajectory to illustrate expected rate of housing delivery
 - Set out a housing implementation strategy describing how they will maintain delivery of a five-year supply of housing land; and
 - Set their own approach to housing density to reflect local circumstances.
- 2.13 Paragraph 49 states that if an authority is unable to demonstrate a five year supply of deliverable housing land, then policies relating to the supply of housing are considered to be out of date and planning applications would be considered “in the context of the presumption in favour of sustainable development”.
- 2.14 NPPF (paragraph 48) states that an allowance for windfall sites can be included in the five year supply calculation when it can be demonstrated that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. The allowance must be realistic and have regard to the SHLAA, historic windfall delivery rates, and exclude residential gardens. NPPG adds that broad locations can be identified in years 6-15, which could include a windfall allowance based on a geographical area but this must follow the same criteria as paragraph 48.
- 2.15 NPPF (paragraph 111) sets out that planning policies should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. NPPF (paragraph 51) also sets out that local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers.
- 2.16 Paragraph 85 refers to the necessity to also identify areas of safeguarded land in order to meet longer-term development needs stretching well beyond the plan period. This

land is not allocated for development at the present time and planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development.

Gypsy and Travellers and Travelling Showpeople needs and supply

- 2.17 Planning policy for traveller sites (August 2015), which should be read in conjunction with NPPF/NPPG, sets out specific guidance relating to Travellers which states that local authorities should assess needs for the purposes of planning and develop fair and effective strategies to meet needs through the identification of land. It encourages local authorities to plan for sites over a reasonable timescale whilst recognising that the green belt should be protected from inappropriate development and that travellers may own sites.
- 2.18 Planning policy for traveller sites states that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for Travelling Showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.
- 2.19 The policy also states that local planning authorities should, in producing their local plan:
- Identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years worth of sites against locally set targets;
 - Identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15;
 - consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area;
 - relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density; and
 - protect local amenity and environment

Other relevant national policies

- 2.20 Other relevant government policies linked to the housing element of Local Plan include:
- Housing Bill¹ - proposed in the 2015 Queen's Speech including measures to extend right to buy to housing association tenants, require local authorities to sell their most valuable homes, provide a statutory framework to deliver starter homes, require local authorities to provide assistance to self-builders and introduce a statutory register of brownfield land.

¹ <https://www.gov.uk/government/publications/queens-speech-2015-what-it-means-for-you/queens-speech-2015-what-it-means-for-you#housing-bill>

- Full Employment and Welfare Benefits Bill²- also proposed in the 2015 Queen’s Speech. This will impact on housing by removing the automatic entitlement to housing benefit for 18-21 year olds.
- Laying the Foundations: A Housing Strategy for England³ – although published under the previous government, this document sets out details in relation to home ownership, social housing and the role of the private sector.
- Fixing the Foundations Productivity Plan⁴ includes measures to ensure local plans are in place, strengthened guidance on Duty to Cooperate, promotes high density housing around commuter hubs, sets out the government’s commitment to starter homes and promotes a ‘zonal’ planning system to promote brownfield sites.

² <https://www.gov.uk/government/publications/queens-speech-2015-what-it-means-for-you/queens-speech-2015-what-it-means-for-you#full-employment-and-welfare-benefits-bill>

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7532/2033676.pdf

⁴ <https://www.gov.uk/government/publications/fixing-the-foundations-creating-a-more-prosperous-nation>

3. Local context

3.1 A number of local strategy and evidence documents provide relevant context, including:

- Kirklees Economic Strategy⁵ - recognises the role of housing growth “to support economic development and quality of life, through delivery of more, better and affordable housing; including in town centres and through currently underused assets”.
- The Kirklees Empty Homes Strategy 2011-2015⁶ - sets out a range of measures to reduce the number of empty homes in Kirklees, set out in a three tiers:
 - Advice and Guidance: Providing basic advice to property owners to alert them of the options available to them
 - Assessment and Support: Properties that have been empty for a longer period of time may require assessment – taking into account the level of housing need, the length of time vacant, property condition, social impact and number of complaints. Options available to property owners may be financial incentives, assistance from Homes and Communities Agency and Kirklees Private Letting Service.
 - Problem Properties: For properties suffering from blight due to being empty. Measures include provision for the Council to take over the management of the dwelling, demolition orders and enforcement notices.
- A Place to Live Life to the Full - Accommodation Strategy for Older People in Kirklees 2010-2015 – sets out demographic changes leading to greater needs for accommodation for older people in the next 20 years. It states that without social care arrangement changes it will become increasingly difficult to support older people to live independently. The strategy seeks to increase housing choices for older people, bearing in mind the need, lifestyles, and historic barriers for owner occupiers.
- “A Place to Live” A Joint commissioning strategy for accommodation for people who experience mental health problems in Kirklees 2012-2015 is based on three principles:
 - individuals who experience mental health problems should not have to undergo a change in accommodation to receive the level of care that they need at any particular time, and that a range of options are available with regards to having a place to live;
 - focus on independence and autonomy should not be lost for individuals who do require periods of support within specialist accommodation services; and
 - support solutions should be co-produced.

⁵ <http://www.kirklees.gov.uk/involve/entry.aspx?id=661>

⁶ <https://www.kirklees.gov.uk/business/regeneration/localplan/pdf/emptyHomesStrategy.pdf>

- “A Place to Live” an Accommodation Strategy for adults with learning disabilities living in Kirklees (2008) - seeks to create ordinary housing options and improve access for people with learning disabilities to community housing provision, creating more choice and control over where people choose to live. The strategy seeks to meet these objectives by building effective partnerships with accommodation providers, using person centred approaches to meet people’s needs and developing a greater diversity of housing and support options within Kirklees.
- The Housing Commission Strategy 2013-2016 - developed in consultation with the council’s key partners and stakeholders, in the context of council strategies and evidence. The strategy sets out the national and local housing context, identifies the current housing challenges faced in Kirklees and details the actions that the council and its partners will take to address to respond to the challenges. The Housing Commissioning Strategy is underpinned by, and contributes to, the council’s wider priorities for tackling poverty, stimulating economic growth and inward investment and improving the health and wellbeing of all residents in Kirklees.
- Kirklees Joint Health and Wellbeing Strategy⁷ - recognises safe, affordable, warm housing as a determinant of health in the district.

⁷ <https://www.kirklees.gov.uk/you-kmc/deliveringServices/jointHealthAndWellbeingStrategy.aspx>

4. Evidence base – objectively assessed housing needs

Housing market areas and housing needs

- 4.1 To fully understand the objectively assessed needs, analysis is required to determine the extent of the housing market area as well as the calculation of need within that area taking account of a range of factors.

Identifying the housing market area

- 4.2 In determining the housing needs of Kirklees, it is important to consider the extent of the housing market area and whether the district can be considered to be self-contained in planning policy terms. The Kirklees Strategic Housing Market Assessment (SHMA) considers previous analysis undertaken at sub-regional level of housing market areas, which showed that the housing market geography of Kirklees is complex and linked to the wider Leeds City Region.
- 4.3 In 2010, the government published the Geography of Housing Market Areas (National Housing and Planning Advice Unit) which sought to construct a consistent geography of housing market areas for England. The research examined different levels of housing market areas based on a consideration of commuting, migration patterns and house price data. The analysis suggested Kirklees is located within wider functional ‘Leeds’ strategic framework housing market area which also includes Barnsley, Leeds, Wakefield and Harrogate. At a more local scale, in Kirklees, the report found housing market areas centred on three areas: Huddersfield (including some areas of Calderdale), Dewsbury and Cleckheaton.
- 4.4 In 2014, work was undertaken within the Leeds City Region to bring together earlier evidence to identify factors to be considered in an updated analysis of the housing market relationships between district areas⁸. This work considered existing reports and more recent evidence as well as the circumstances and potential actions where cross boundary relationships raise matters of strategic significance. It concluded that there are several cross-boundary housing market links in the city region.
- 4.5 The Kirklees Strategic Housing Market Assessment (SHMA) brings together such evidence, taking account of the Leeds City Region context and exploring further issues to provide analysis of the Kirklees housing market area. This includes consideration of house prices and rates of change, household migration and search patterns, and other contextual data, in accordance with planning guidance.
- 4.6 Three localised housing market areas were identified in the Kirklees SHMA including:
- Huddersfield (extending to the north into part of Calderdale);
 - Dewsbury and Mirfield (extending into South Leeds);
 - Batley & Spennings (extending north into Bradford).

⁸ Leeds City Region Partnership: Understanding the cross boundary impacts of housing markets and jointly planning housing provision in these areas (Andy Haigh Associates, May 2014)

4.7 Despite the existence of these localised housing market areas, the SHMA analysis indicates that linkages are not considered to be of sufficient significance in planning policy terms in relation to cross-boundary issues. The full analysis supporting this conclusion is set out in the SHMA which states that the evidence suggests Kirklees is considered to be a self-contained housing market area for local planning policy purposes. It is therefore important to consider the housing needs of Kirklees on that basis.

Assessing housing needs

4.8 National planning practice guidance recognises that the government household projections provide a starting point when estimating overall housing need. These trend-based household projections are produced every two years by the government, based on population projections from the Office for National Statistics. For Kirklees, these projections have been used as a starting point in the generation of demographic and economic scenario analysis carried out through work within the Leeds City Region and through the Strategic Housing Market Assessment (SHMA).

4.9 Taking account of these factors, work was undertaken within the Leeds City Region in 2013 to establish a common methodological approach to calculating objectively assessment of housing requirements.⁹ This was to ensure a consistent approach to determining housing requirements across the City Region.

4.10 Following on from this, the Leeds City Region Demographic Forecasts¹⁰ work (March 2014) considered a range of different assumptions relating to economic forecasts, migration trends and headship rates of households. The analysis forecast the number of additional dwellings to be delivered on an annual basis in Leeds City Region between 2012 and 2031. This information provided the context for each local authority to undertake specific analysis for their district.

4.11 Taking account of this Leeds City Region analysis, in September 2014, demographic analysis was undertaken with a specific Kirklees focus¹¹. This provided Kirklees-specific demographic forecast analysis for the period to 2031 resulting in 15 potential scenarios. This included consideration of demographic and jobs-led scenarios including trend based scenarios and economic based scenarios including those based on the Kirklees Economic Strategy as well as sensitivity testing. Following the publication of 2012-based household projections, the analysis was refined further and an addendum to the final report was published in March 2015¹².

⁹ The objective assessment of housing requirements: Establishing a common methodological approach (Edge Analytics, November 2013)

¹⁰ Leeds City Region: Demographic Forecasts 2012-31 (Phase 1 Report) (Edge Analytics, March 2014)

¹¹ Kirklees Demographic Analysis & Forecasts: Assumptions, Methodology & Scenario results (September 2014)

¹² Kirklees Demographic Analysis & Forecasts: Evaluating the impact of the 2012-based DCLG household projections: Addendum to September 2014 report (March 2015)

4.12 The Kirklees Strategic Housing Market Assessment (SHMA)¹³ provides a further assessment of the information including consideration of the potential impact of market signals. The SHMA does not recommend changes to dwelling targets in the light of market signals as it concludes that the housing market in Kirklees is relatively stable and that market signal trends have generally been in line with regional and national trends.

Setting the local plan housing requirement

4.13 Table 1 summarises the scenarios emerging from the Kirklees-specific demographic projections and forecasting analysis as considered in the SHMA.

Table 1 - Kirklees household scenarios and dwelling requirements 2013-31:

Rank	Scenario	Annual housing need
1	Jobs-led D – 80% Employment Rate	2,191
2	PG – 10yr	1,995
3	Jobs-led C – REM + Kirklees Economic Strategy	1,919
4	Jobs-led D – 80% Employment Rate – SENS1	1,909
5	PG – 5yr	1,883
6	Jobs-led B – 75% Employment Rate	1,730
7	Jobs-led REM	1,662
8	Jobs-led C – REM + Kirklees Economic Strategy –SENS1	1,641
	Kirklees local plan housing requirement	1,630
9	SNPP-2012	1,520
10	SNPP-2010	1,513
11	Jobs-led B – 75% Employment Rate – SENS1	1,454
12	Jobs-led REM – SENS1	1,387
13	Natural change	1,373
14	Jobs-led A – Trend Employment Rate	1,340
15	Jobs-led A – Trend Employment Rate – SENS1	1,069

4.14 After considering scenario outputs, the SHMA considers that the baseline requirement would be 1,520 based on the 2012-based sub-national population projections which include a migration factor. To reflect economic factors, an average has been taken of the employment scenarios in table 1¹⁴ as this takes account of the varying range of assumptions relating to the scale of job growth and economic activity rates within the analysis. As a result, the Kirklees Strategic Housing Market Assessment (SHMA) sets out an objectively assessed need figure of **1,630 per annum**. This is equivalent to a baseline of the 2012-based CLG household projections (rank 9 = 1,520 dwellings), with adjustments for jobs-growth (+110).

Previous housing delivery and consideration of backlog

4.15 The latest examined housing requirement for Kirklees was set out in the Yorkshire and Humber Regional Spatial Strategy (RSS). This set out a requirement for 1,060 new

¹³ Kirklees Strategic Housing Market Assessment (SHMA) (Arc4, November 2015)

¹⁴ Table 1 ranks 1, 3, 4, 6, 7, 8, 11, 12, 14, 15

homes from 2004-2008 followed by a requirement for 1,700 new homes from 2008-2026. The RSS was revoked by the government in 2013. Table 2 sets out the number of annual net housing completions compared to RSS since 2004.

Table 2 - Net annual housing completions prior to local plan (2004 – 2013):

Year	Net annual housing completions	RSS requirement	Completions compared to RSS requirement
2004/5	1,349	1,060	289
2005/6	1,074	1,060	14
2006/7	2,261	1,060	1,201
2007/8	2,281	1,060	1,221
2008/9	1,098	1,700	-602
2009/10	692	1,700	-1,008
2010/11	974	1,700	-726
2011/12	873	1,700	-827
2012/13	753	1,700	-947
Total	11,355	12,740	-1,385

4.16 As the SHMA is based on up to date demographic information relating to the need for housing at the local plan base date (2013), there is no requirement to provide new homes to compensate for past under-delivery against the Regional Spatial Strategy.

4.17 The completions since the local plan base date (1st April 2013) and therefore shortfalls compared to the local plan target have been taken into account in the calculation of the amount of land to be allocated in the local plan (see table 3).

Sustainability Appraisal

4.18 The Sustainability Appraisal of the draft Local Plan assessed the upper (rank 1) and lower (rank 15) scenarios from table 1 as high and low growth scenarios, alongside the 1,630 dwellings per annum draft Local Plan housing requirement. This allows the Sustainability Appraisal to test a higher and lower level of growth relative to the draft Local Plan housing requirement. (See chapter 11 of the full sustainability appraisal report for further information.)

Requirement for housing allocations

4.19 Although the requirement for the local plan period has been identified through the SHMA as 1,630 dwellings per annum, a number of factors have been considered to calculate the number of new homes to be accommodated on local plan housing allocations. These include factors such as completions to date, existing planning permissions, a windfall allowance, allowance for losses and a flexibility allowance as set out in table 3 followed by an explanation.

Table 3 - Supply and sources of housing in the Local Plan:

	Housing Supply Sources / Allowances	Explanation	Number of homes
A	Housing requirement (from the Strategic Housing Market Assessment)	Housing required over the plan period (1,630 x 18 years within the period 2013-31)	29,340
B	Net housing completions (2013/14)	New homes built in the first year of the plan period	-1,036
C	Sites with planning permission at 01/04/2014	Remaining capacity on existing planning permissions	-6,350
D	Windfall allowance	Allowance of 450 per annum (2021-31 only)	-4,500
E	Allowance for homes lost through demolition / change of use / conversion	90 per annum for remaining plan period (2014-31)	+1,530
F	Sub-Total of land to be allocated in the Local Plan	Total derived from A-E above	18,984
G	5% flexibility rate on site allocations	Ensuring flexibility, choice and competition in the market for land	+949
H	Total amount of land to be allocated in the Local Plan	Total taking account of factors A-G above	19,933

A. Housing requirement

- 4.20 The SHMA identifies a Kirklees housing requirement of 1,630 dwellings per annum for the period from 2013-31 which equates to 29,340 dwellings.

B. Net housing completions (since local plan base date)

- 4.21 There have been 1,036 new homes built (net) in the period 2013/14 (table 4) which have met some of the identified need during the local plan period (2013-31).

Table 4 - Net annual housing completions since 1st April 2013:

Year	Net annual housing completions	Draft Local Plan requirement	Completions compared to draft Local Plan requirement
2013/14	1,036	1,630	-594
Total	1,036	1,630	-594

C. Sites with planning permission

- 4.22 At 31st March 2014, 6,350 homes have yet to be built on sites with existing planning permissions in Kirklees. These will contribute to meeting needs, particularly in the earlier part of the plan period. As the draft Local Plan progresses, this figure will be adjusted to reflect the latest available monitoring information.

D. Windfall allowance

- 4.23 The total number of new homes built on windfall sites since 1999/2000 (excluding residential gardens) was 13,633 (an average of 908 per annum) (see Appendix 1). Residential gardens were not included in the calculation to ensure consistency with national planning policy. The de-industrialisation of many parts of the district, including high levels of housing delivery on brownfield sites has contributed to a high percentage of housing on windfall sites. In addition, the “brownfield first” approach in previous national planning policy and the council’s restrictive approach to greenfield development during much of this period restricted the development of greenfield housing allocations until recent years. This may have led to the increase in delivery on windfall sites as particularly brownfield sites were developed in the absence of available greenfield capacity.
- 4.24 The past rate of delivery on windfall sites demonstrates that this has been a reliable source of supply over the past 15 years and it is therefore appropriate to include a windfall allowance in the local plan calculations. As the local plan will allocate land for approximately 20,000 new homes and many vacant industrial sites have already been redeveloped, the amount of housing delivered on windfall sites is likely to be lower than past delivery rates indicate.
- 4.25 Despite this, there is still a significant amount of land currently in use for industry which could become vacant over time. The local plan sets out policies relating to the re-development of employment sites for other uses. In addition to this, sites below the Local Plan size threshold (0.4 hectares) will also continue to play an important role in the delivery of housing throughout the plan period.
- 4.26 It has been assumed that the local plan housing requirement for the early years of the local plan will be delivered from local plan housing allocations and sites which already have planning permission. As such, the local plan only includes a windfall allowance for the final ten years of the plan.
- 4.27 Although past windfall delivery rates were on average approximately 900 per annum, due to the factors referred to above, this level has been adjusted to approximately half of previous delivery levels. A windfall allowance of 450 per annum is therefore proposed for the final ten years of the plan period (2021-2031) and has been included in the land requirement calculations. This is for the geographical area of Kirklees, which is the self-contained housing market area as identified in the Kirklees SHMA. The total amount of housing anticipated on windfall sites during the plan period is therefore 4,500.

E. Allowance for losses

- 4.28 Sites granted planning permission for new housing can include some demolition of the existing stock. There are also instances where dwellings are demolished, converted (e.g. 2 dwellings converted to 1) or lost through change of use (e.g. dwelling converted to shop).

Table 5 - losses through demolition, change of use and conversion:

Losses	09/ 10	10/ 11	11/ 12	12/ 13	13/ 14	Average
Demolitions	21	22	29	21	45	27
Change of use	15	27	28	19	10	19
Conversion	53	83	35	29	31	46
Total losses	89	132	92	69	86	93

4.29 Table 5 shows that there has been an average loss of approximately 90 dwellings per annum. An allowance has therefore been added to the requirement for the remaining 17 years of the plan period (2014-2031), equating to an additional requirement for 1,530 dwellings over the plan period.

F. Sub-total of land to be allocated in the local plan

4.30 The factors considered in A – E would lead to a local plan housing requirement of 18,984. However, to ensure delivery, it is important to consider flexibility.

G. Flexibility

4.31 NPPF (paragraph 47) sets out that a 5% buffer in the five year land supply calculation is appropriate to ensure choice and competition in the market for land. A flexibility allowance of 5% has therefore been added to achieve this aim and it also acts as a contingency in case some sites do not come forward as anticipated. This equates to 949 dwellings over the plan period. It should be noted that the five year supply buffer calculation is a separate consideration (see paragraph 6.10).

H. Total amount of land to be allocated in the draft Local Plan

4.32 As shown in table 3, there is the need to allocate land in the draft Local Plan to accommodate an additional 19,933 new homes.

Empty homes

4.33 Consideration has been given to whether empty homes can be brought back into use to contribute to future needs through the local plan period. Temporary vacancy is a result of the normal operation of the housing market, as people buying and selling their homes resolve legal and financial issues.

4.34 The council has an Empty Homes Strategy which has helped to reduce the number of empty homes, including long-term vacancies, in the district through a variety of methods. The Strategic Housing Market Assessment (SHMA) sets out the latest information relating to empty homes. The draft Local Plan does not rely on new housing capacity from this source as there would need to be robust evidence that the supply of empty homes brought back into use would be consistent over the plan period.

4.35 Any additional housing capacity made available through bringing empty homes back into use will provide further flexibility in meeting the housing requirement. The number of empty homes will continue to be monitored to establish whether there is any significant change in vacancy and to consider if further action is needed.

Safeguarded land

- 4.36 There is also a requirement to provide safeguarded land to meet longer term development needs beyond the end of the Local Plan period (i.e. from 2031 onwards). The draft Local Plan policies map shows sites proposed as safeguarded land.

Housing tenure and mix

- 4.37 The Kirklees SHMA provides an overview of the housing market characteristics in the district based on price, tenure and type of housing stock. For this purpose the district is divided into six areas for analysis purposes, based on the four Local Plan sub areas as set out in table 6.

Table 6 – SHMA sub-areas:

SHMA sub-area	Wards	Draft Local Plan sub area
Batley and Spen	Batley East, Batley West, Birstall & Birkenshaw	Batley and Spen
Dewsbury and Mirfield	Dewsbury East, Dewsbury South, Dewsbury West; Mirfield	Dewsbury and Mirfield
Huddersfield North	Ashbrow, Golcar, Greenhead, Lindley	Huddersfield
Huddersfield South	Almondbury, Crosland Moor & Netherton, Dalton, Newsome	Huddersfield
Kirklees Rural East	Denby Dale, Kirkburton	Kirklees Rural
Kirklees Rural West	Colne Valley, Holme Valley North, Holme Valley South	Kirklees Rural

- 4.38 The SHMA used a variety of methods to analyse issues relating to housing mix and affordability including secondary information from housing lists and existing evidence documents as well as primary information from household surveys, interviews with estate agents and council officers. This evidence base provides detailed analysis of the housing market in terms of the supply and the demand for specific housing types. This information will be used to inform the application of the draft Local Plan housing mix policy.
- 4.39 In terms of house-prices there is significant variation around the district with the highest prices in Kirklees Rural East and the lowest in Huddersfield and Batley and Spen. However there are pockets of high and low prices across all of the sub-areas.
- 4.40 Affordable housing is defined in NPPG¹⁵ as “Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.”

¹⁵ <http://planningguidance.planningportal.gov.uk/blog/policy/achieving-sustainable-development/annex-2-glossary/>

4.41 The SHMA calculated the affordable housing annual shortfall figure using an assessment of:

- Households currently in housing which is unsuitable for their use and who are unable to afford to buy or rent in the market (backlog need);
- New households forming who cannot afford to buy or rent in the market;
- Existing households expected to fall into need; and
- The supply of affordable housing through social renting and intermediate tenure stock.

4.42 The Kirklees SHMA sets out the shortfall in affordable housing on an annual basis. The significant affordable housing shortfall identified provides evidence in support of the inclusion of the draft Local Plan affordable housing policy.

Gypsy and Travellers and Travelling Showpeople needs

4.43 The council has commissioned a Gypsies and Travellers and Travelling Showperson Accommodation Assessment¹⁶ to set out the objectively assessed accommodation needs which forms part of the Local Plan evidence base. This report includes a requirement for 12 Gypsy and Travellers pitches, 4 Travelling Showperson plots and 8 transit plots. A detailed explanation can be found in the Gypsies and Travellers and Travelling Showperson Accommodation Assessment.

¹⁶ Kirklees Gypsy and Traveller and Travelling Showperson Accommodation Assessment Arc4 August 2015

5. Meeting housing needs

Assessment of sites to meet the housing requirement

- 5.1 The Local Plan must identify housing capacity to meet the housing requirement. As table 3 showed, the draft Local Plan housing allocations need to accommodate 19,933 new homes.

Sources of potential housing sites

- 5.2 Potential housing sites assessed through the Local Plan process have a number of sources. There has been the opportunity for anyone to submit sites to be considered for development or protection since the adoption of the Unitary Development Plan (UDP) in 1999. It is, however, important to note that the local plan process requires housing allocations to be available for development during the local plan period therefore evidence of a willing landowner is required. The council recently wrote to those promoting sites through the development plan process to confirm their continued interest in developing their land. Other housing site options considered have emerged from a council review of its own assets and assessment of existing UDP housing allocations and Provisional Open Land.

Site assessments

- 5.3 The council have published a methodology paper which sets out the methodology for the allocation of sites for development and protection. This includes the methodology for assessing sites for housing, mixed use and Traveller and Travelling Showpeople sites. The sites accepted for new housing are shown on the draft Local Plan Policies Map and details set out in the draft Local Plan Allocations and Designations document. Rejected options for housing have been published on a Local Plan rejected site options map with an associated rejected site options report outlining the general reasons for rejection of the housing option.

Distribution of draft Local Plan capacity

- 5.4 As at 31st March 2014, there were remaining planning permissions to build 6,350 new homes in Kirklees. These consist of full permission, outline permission and those granted through permitted development rights. The location of planning permissions for housing at 31st March 2014 is shown in table 7.

Table 7 - Dwellings with planning permission by district committee area:

Sub area	Number of dwellings with planning permission
Batley and Spen	1,420
Dewsbury and Mirfield	929
Huddersfield	1,642
Kirklees Rural	2,359

- 5.5 Table 8 sets out the expected number new homes on draft Local Plan accepted housing allocation options or mixed use allocations by sub area.

Table 8 - Capacity of Local Plan accepted housing options by district committee area:

Sub area	Capacity of Local Plan accepted housing options
Batley and Spen	4,715
Dewsbury and Mirfield	4,838
Huddersfield	7,351
Kirklees Rural	5,148

Safeguarded land

- 5.6 The draft Local Plan policies map shows sites proposed as safeguarded land. These are generally sites where constraints are such that the site would not be appropriate to accommodate development within the local plan period but with a realistic prospect that these constraints can be overcome to accommodate development in the longer term.

Housing tenure and mix

- 5.7 The draft Local Plan includes Policy DLP11 relating to housing mix and affordability. This policy seeks to deliver a housing mix to reflect the evidence base set out in the Strategic Housing Market Assessment (SHMA) whilst considering viability issues particularly on smaller sites in relation to NPPF paragraph 173.
- 5.8 The affordable housing shortfall outlined in the SHMA has also been considered and provides justification for the draft Local Plan policy to seek to secure the delivery of affordable housing. This shortfall has been considered alongside viability evidence to set the affordable housing requirement at 20% of the total units on market schemes of more than 10 homes. Other delivery mechanisms such as the use of grant funding will also continue to be explored during the plan period.

Gypsy and Travellers and Travelling Showpeople sites

- 5.9 The draft Local Plan seeks to meet the needs of Gypsies and Travellers and Travelling Showpeople in accordance with the evidence base by allocating sufficient sites to meet needs. Potential sites were assessed in accordance with the Local Plan methodology for the allocation of sites. Accepted draft Local Plan options are shown on the Policies Map and details set out in the draft Local Plan allocations and designations document. Rejected site options have been published on a Local Plan rejected site options map with an associated rejected site options report outlining the general reasons for rejection of the option.

6. Delivery and implementation strategy

6.1 This section sets out the delivery of the Local Plan housing capacity including exploring the land types (brownfield/greenfield) and the phasing of sites throughout the Local Plan period.

Land type

6.2 Table 9 shows the number of housing completions by brownfield and greenfield land from 2004 – 2014 which shows that a significant proportion of new homes have been delivered on brownfield sites within this period. This reflects the availability of brownfield sites for re-development, the “brownfield first” policy in previous national planning policy and the council’s restrictive approach to greenfield development during much of this period.

Table 9 - Housing completions by land type 2004 – 2014:

Year	Gross completions	Brownfield completions	Brownfield percentage
2004/5	1,356	1,253	92.40
2005/6	1,142	1,000	87.57
2006/7	2,631	2,388	90.76
2007/8	2,428	2,223	91.56
2008/9	1,217	1,087	89.31
2009/10	781	694	88.86
2010/11	1,106	913	82.55
2011/12	965	726	75.23
2012/13	822	579	70.44
2013/14	1,144	806	70.45

6.3 As table 9 shows, there has been a decreasing trend in brownfield completions over this period which reflects the available supply of brownfield sites and less restrictive national planning policies in relation to the development of greenfield land. It is expected that this decreasing trend of new homes on brownfield sites will continue into the Local Plan period.

6.4 Approximately 46% of sites accommodating new homes during the Local Plan period (including planning permissions and draft Local Plan housing allocations) are brownfield. Within this, the actual number of homes within the Local Plan (including planning permissions and housing allocations) equates to approximately 28% on brownfield land. It can be assumed that the majority of completions from the windfall allowance will also be built on brownfield land therefore the actual brownfield percentage is likely to be higher than this initial estimate.

6.5 Although the Local Plan does not set a brownfield development target, the council are committed to a brownfield *first* approach as part of the Local Plan development strategy; however this is not the same as a brownfield *only* approach. Landowners

have submitted sites to the council for consideration as housing allocations in the Local Plan process and these sites have been assessed for the suitability as housing allocations. It should be recognised that not all landowners of brownfield sites wish to put their land forward and often brownfield land is in an operational use. The Local Plan must demonstrate the availability of sites to accommodate the development and therefore that there is a willing landowner supporting the development.

Site phasing

- 6.6 The draft Local Plan does not include a specific housing allocations phasing policy as this approach could place an unnecessary constraint on housing delivery in Kirklees. Larger sites should be brought forward with a masterplan including a phasing and implementation plan, in accordance with draft Local Plan policy DLP4. Draft Local Plan policy DLP3 acknowledges that essential infrastructure to support the development must be operational at the appropriate phase of development for which it is needed.
- 6.7 The housing approach includes an indicative trajectory based on the draft Local Plan phasing schedule. The trajectory will be monitored annually using analysis in the Strategic Housing Land Availability Assessment (SHLAA) and housing completions reported in the Annual Monitoring Report (AMR). The phasing schedule does not prescribe when sites should come forward, but sets out delivery assumptions as evidence of delivery to meet the Local Plan housing requirement. These assumptions consider lead-in times, build rates, proximity of other sites and site constraints.

Lead-in times

- 6.8 Lead-in times are applied to site phasing calculations to take account of the time it takes for planning permission to be granted and for development to start on sites. The lead-in times set out in table 10 have previously been agreed by the Kirklees SHLAA working group (2013) and are considered to continue to represent a reasonable assumption in calculating site delivery. The phasing work does not assume any completions during the lead-in times set out below.

Table 10 – Assumed lead-in times on housing sites:

Type of site	To achieve outline planning permission	To achieve reserved matters permission	Time for development to start on site	Total lead-in time
Full planning permission where development has started	-	-	-	-
Full or reserved matters planning permission where development has not yet started	-	-	0.5 years	0.5 years
Outline planning permission	-	0.5 years	0.5 years	1 year
Sites without planning permission	0.5 years	0.5 years	0.5 years	1.5 years

- 6.9 As the actual completions for the first year of the Local Plan (2013/14) have already been monitored, the lead-in times in table 10 take effect from 2014/15. Where development has already started on sites, there is no-lead in time, however, if development has not yet started on a site with full planning permission, the lead-in time has been adjusted to allow the building to start. For sites with outline permission, the time to achieve permission for reserved matters has been taken into account as well as the time to begin building. For sites without planning permission, the lead-in times have taken account of time to achieve outline planning permission and reserved matters permission as well as begin building. There is the potential for sites to be brought forward earlier if full planning permission is applied for in the first instance.
- 6.10 The lead-in times applied to sites without a current planning permission mean that the majority of draft Local Plan housing allocations will not provide housing completions until at least 2017/18. Where planning permission has been granted since the last monitoring update (1st April 2014), this has been taken into account in the phasing work.
- 6.11 The largest sites have been phased to start in the first year from the plan’s adoption on the basis that detailed masterplanning will be undertaken through the Local Plan process providing certainty at the planning application stage. Assumptions have been made relating to the delivery in the earlier years on these sites.

Build Rates

- 6.12 Build rates indicate the number of dwellings expected to be built on each site per annum following the lead-in period. Sites with less than 200 dwellings are expected to have one developer on the site. Recent data from major housebuilders show that sales rate per outlet per week is commensurate with the build rate stated below for a site with one developer. It is anticipated that larger development sites would have a higher rate of delivery each year because they would allow more developers to sell housing, offering a greater range of products at different prices.

Table 11 – Build rates:

Overall dwelling capacity	Number of sites affected	Build rate
Less than 200	179	30 dwellings per year
200 - 500	20	50 dwellings per year
500 - 1000	5	80 dwellings per year
1000 – 2000	2	120 dwellings per year
2000+	1	165 dwellings per year

Proximity of other sites

- 6.13 In some circumstances sites have been phased together to provide a more realistic estimate of delivery when sites that are adjacent to each other are delivered. Where sites are phased together, the build rate for the capacity of the combined sites has been applied.

Site constraints

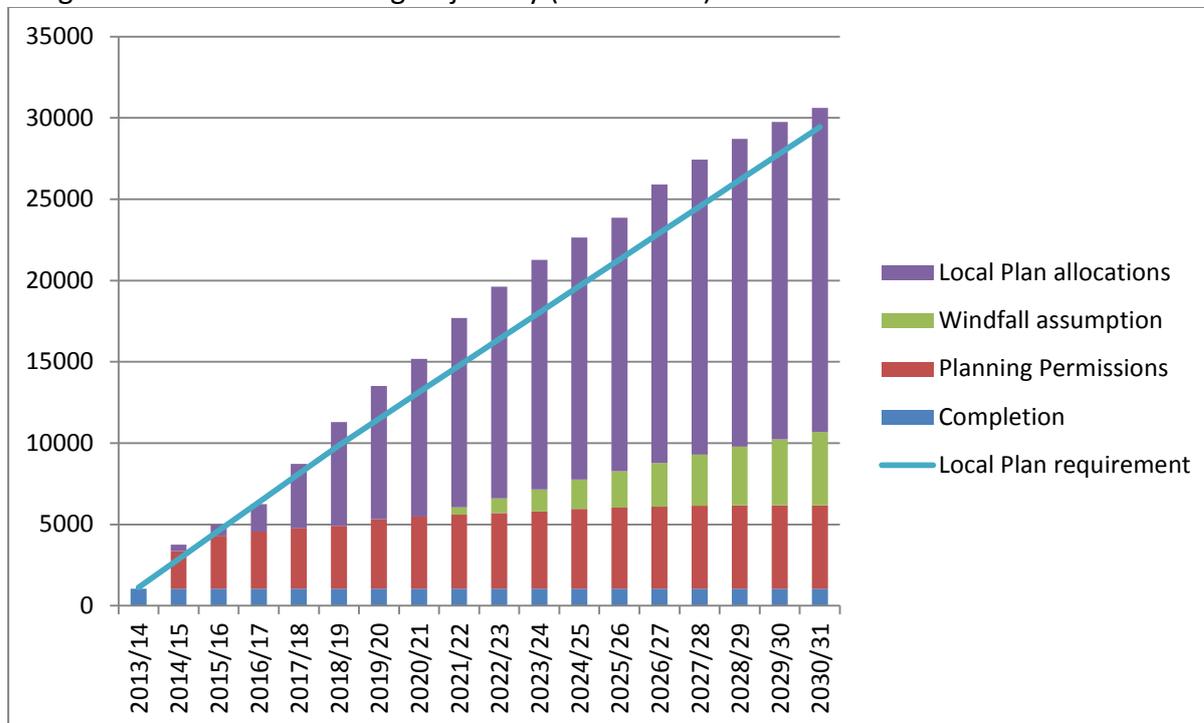
6.14 Site constraints have been assessed through the site allocations process including input from technical consultees as set out in the site allocations methodology. On draft Local Plan housing allocations, an assessment has been made that constraints will be overcome during the plan period but this may mean delivery later in the plan period. For example, sites currently in operational use for industry or specified by the land owner as unavailable until a later phase have been phased accordingly.

Delivering a wide choice of high quality homes

6.15 The housing phasing as shown in the draft Local Plan document sets out that the council can demonstrate a five year supply of deliverable housing sites in the early years of the plan. At present, as there has been a record of persistent under-delivery, the five year supply calculation includes a buffer of 20% to provide a realistic prospect of achieving the planned supply, in accordance with NPPF paragraph 47. The phasing table will be updated as the Local Plan progresses towards examination.

6.16 Figure 1 below shows an indication of the expected rate of housing delivery throughout the plan period on a cumulative basis to enable understanding of the delivery from capacity identified through the Local Plan process. As set out in paragraph 4.27, the trajectory does not include a windfall allowance until the final ten years of the plan period.

Figure 1 - Local Plan housing trajectory (cumulative):



Monitoring

- 6.17 The council will continue to monitor new planning permissions for housing and report these through the Strategic Housing Land Availability Assessment (SHLAA). Housing completions are monitored annually and reported in the Annual Monitoring Report. Such monitoring will allow an assessment of the progress towards meeting the Local Plan housing requirement including demonstrating whether the council can demonstrate a five year supply of deliverable housing sites. Such monitoring would identify delivery issues and allow actions to be implemented as set out in the draft Local Plan strategies and policies document.
- 6.18 The council will also monitor the provision of new Gypsy and Traveller pitches and Travelling Showpeople plots through the Annual Monitoring Report including demonstrating whether a five year supply of Gypsy and Traveller and Travelling Showpeople sites can be demonstrated.

Appendices

Appendix 1 - Past delivery on windfall sites

Table 12: Housing completions on windfall sites 1999-2014:

Year	Gross completions	Windfall completions (not on residential gardens)	Windfall percentage
1999/00	1,171	408	34.8%
2000/01	1,045	513	49.1%
2001/02	897	493	55.0%
2002/03	979	638	65.2%
2003/04	1,126	782	69.4%
2004/05	1,356	957	70.6%
2005/06	1,142	923	80.8%
2006/07	2,631	2,043	77.7%
2007/08	2,428	2,054	84.6%
2008/09	1,217	1,080	88.7%
2009/10	781	697	89.2%
2010/11	1,106	906	81.9%
2011/12	965	763	79.1%
2012/13	822	558	67.9%
2013/14	1,144	818	71.5%
Total	18,810	13,633	72.5%