

Affordable Housing Needs

On behalf of SOSGB (and for my own objections) I've been reading through the Scholes Housing Needs Survey that has been submitted by EcoHolmes. We understand this document will be used to 'prove the affordable housing need in Scholes' (and Hepworth it seems) and provide evidence that the Kirklees Local Plan will not deliver adequate affordable homes to meet this need, in order to gain the 'rural exception' needed to build on Green Belt land.

We believe this report is flawed and does not provide a true representation of the affordable housing needs in Scholes. The report references two different areas from which it has gained its results 'due to low responses' and also states "Further analysis of the need for the affordable housing will focus on modelled data using the basic needs assessment model BNAM, which turns the above snapshot information into annual needs and factors in several sources of supply." Their conclusions are partly based on a model and not local fact.

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|------|---|
| 5.8 | The snapshot of affordable need measured by the household survey was 13 households in HD9 1 and 7 households in the Scholes BUA. |
| 5.9 | This is compared to other sources of data including the housing register. Snapshot data from the survey and the housing register are converted into an annual flow, and if an average of all measures is taken, we conclude that the need in HD9 1 and the BUA is 83 and 25 households per annum respectively. Supply from vacancies, first lettings and sales from committed future development is projected forward to arrive at an estimate of the amount of supply to deduct from the above gross need. The net requirement for additional affordable housing for the BUA is between 17 and 20 dwellings per annum. |
| 5.10 | Our key finding is that my client's proposal for 10 affordable dwellings is justified. The scale of unmet need in the Scholes BUA would justify a rural exception. |

Scholes HNS

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- housing register snapshot data (district level need pro rata); and
 - local needs data from the housing register supplied by the council (which is currently awaited).
- 5.76 A full description of the BNAM model and the assumptions we have made regarding inputs to the BNAM are contained in the technical appendix at the end of this report.

It seems that key local needs data supplied by the council was 'currently awaited', and other figures from local housing data requested from Kirklees Council were not available when the report was written.

According to the report around 3,000 flyers were dispatched and 156 surveys were completed, all of which were completed online. 88 were received from Scholes Built Up Area.

156 responses to a survey sent to 3000 people, with only 88 from Scholes and Hepworth! Can the results from this number of people really be used to 'robustly evidence' the need for affordable housing enough to justify the loss of Green Belt? In our minds, it cannot.

The Planning Officer assigned to the application also confirmed:

The applicant needs to demonstrate compliance with Policy LP11 of the Kirklees Local Plan, which states: Exceptionally, planning permission may be granted for affordable homes on land which would not normally be permitted for housing development, where there is otherwise little prospect of meeting robustly evidenced local needs particularly for housing to rent by people who work locally. Where appropriate, such schemes must include arrangements for the homes to remain affordable in perpetuity.

The **Scholes Built Up Area** specified in the report is predominantly housing so where are the many employment opportunities for people to work in this area enough to justify building homes for local workers on Green Belt land?

Affordable Housing Need Calculation Issues

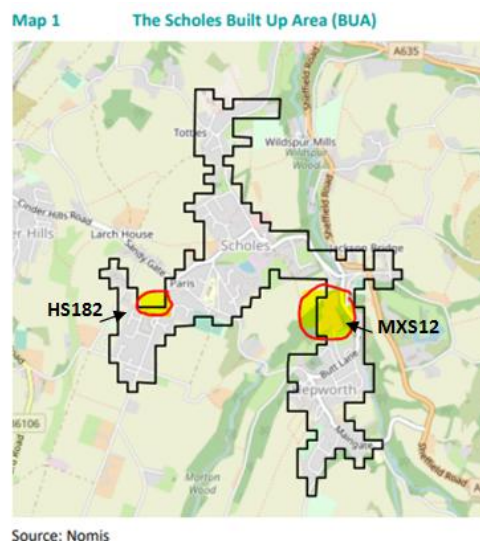
One of the main issues we have is with the below figures detailed in the report.

What is the affordable housing need in Scholes BUA?

The housing needs survey (HNS) has concluded that:

- need exists for between **17 and 20** affordable dwellings per annum over the next 5-years after **taking supply from existing housing and potential new development into account (Local Plan allocated site HS182)**;
- this need arises from both existing and newly forming households;
- all size and types of dwellings are needed, with an emphasis on 1 or 2-bedroom dwellings and the affordable home ownership tenure; and
- affordable rented homes are also needed.

The Holme Valley NDP Made Plan and the Kirklees Local Plan both include two sites that are located within the Scholes Built Up Area (see map below).



These Local Plan allocated sites are **HS182** (28 houses proposed) and **MXS12** (75 houses proposed). The total number of proposed houses for these sites combined is 103.

Location	Site Number	Number of Houses Proposed	Housing or Mixed Development
South of Sandy Gate, Scholes	HS182	28	Housing
West of Bankfield Drive, Holmbridge	HS183	23	Housing
West of Wesley Avenue, Netherthong	HS184	38	Housing
West of Miry Lane, Thongsbridge	HS185	39	Housing
West of Stoney Bank Lane, Thongsbridge	HS186	53	Housing
Tenter Hill Road, New Mill	HS187	81	Housing
West of Royds Avenue, New Mill	HS188	53	Housing
South of Former Midlothian Garage, New Mill Road, Holmfirth	HS189	12	Housing
South of Water Street, Holmbridge	HS190	19	Housing
Former Midlothian Garage, New Mill Road, Holmfirth	HS191	56	Housing
Dobroyd Mills, Hepworth Road, Hepworth	MXS12	75	Mixed
Lancaster Lane, Brockholes	HS173	14*	Housing

The Planning Officer has confirmed that *'policy requires that developments over 10 units provide 20% of their units as affordable housing.'* **20% of 103 houses would be 20 houses.**

So why has 'Local Plan allocated site MXS12' (Dobroyd Mills, Hepworth Road, Hepworth) housing figures NOT been included in the calculation that resulted in the figures of *'between 17 and 20 affordable dwellings per annum over the next 5 years being needed after taking supply from existing housing and potential new development into account (Local Plan allocated site HS182).'*

Note: Local Plan allocated site MXS12' (Dobroyd Mills, Hepworth Road, Hepworth) is a BROWNFIELD site, which is much more suitable and in keeping with EcoHolmes 'green ethos' for this type of eco affordable housing development.

Site MXS12

Local Plan ID	MXS12
Site address	Dobroyd Mills, Hepworth Road, Hepworth , Holmfirth
Ownership	Private
Gross Site area (Ha)	4.22
Net Site area (Ha)	3.45 - BAP Priority Habitat and high flood risk areas removed from the developable area.
Constraints	• Intensification of HGV use not acceptable in highways terms due to Sheffield Road / East Street • Part of the site is within flood zone 3 • Dike runs to the east of the site, mill pond to the west • Noise source near site • Potentially contaminated land • Site is close to listed buildings • Site is close to a Conservation Area • Part of this site lies within a UK BAP priority habitat • Site is within the Wildlife Habitat Network • Public right of way crosses the site
Allocation	Mixed use - housing and employment
Indicative capacity: Housing	75 dwellings
Indicative capacity: Employment (sq.m)	880
Reports required	• Transport Statement • Air quality impact assessment • Contamination report (Phase 1 and 2)

Site HS182

Local Plan ID	HS182
Site address	Land to the west of, Scholes Moor Road, Scholes, Holmfirth
Ownership	Private
Gross site area (Ha)	0.8
Net site area (Ha)	0.8
Constraints	• Odour source near site - Odour from nearby farm • Site is close to listed buildings
Allocation	Housing
Indicative capacity	28 dwellings
Reports required	• Transport Assessment • Travel Plan • Surface water drainage report • Contamination report (Phase 1) • Odour assessment • Heritage Impact Assessment • Health Impact Assessment
Other site specific considerations	• Access to the site should be provided via Moorlands • The boundary walls to the site shall be retained as part of any development proposals

Other points that SOSGB are questioning are as follows:

3.21. According to the 2011 Census, in Scholes BUA there was a large proportion of owned outright dwellings and social rental dwellings.

5.11. Around 3,000 flyers were dispatched and 156 surveys were completed, all of which were completed online. **Only 88 were received from Scholes Built Up Area.** *Can this figure really be used to 'robustly evidence' the need for affordable housing enough to justify the loss of Green Belt? We do not believe it can!*

5.32. Based on the survey, the main priority in terms of household groups very clearly appears to be for first time buyers, with no priority based on private rentals. *Why are EcoHolmes focussing on providing affordable/social housing for rent?*

5.48. The evidence suggests for local households, there may be a small amount of need for bungalows or semi detached dwellings. *Why have EcoHolmes not included bungalows in their designs?*

5.52. Evidence from the household survey suggests 31 people are planning to leave an existing household and find a place of their own over the next 5 years. Of these, 14 plan to remain in the HD9 1 area- 5 currently reside in Scholes BUA. *So where do these figures come from?*

The housing needs survey (HNS) has concluded that:

- need exists for between 17 and 20 affordable dwellings per annum over the next 5-years after taking supply from existing housing and potential new development into account (Local Plan allocated site HS182);
- this need arises from both existing and newly forming households;

5.62. In both Scholes BUA and HD9 1 some 70% of the affordable need is for 1 and 2 bedroom homes. In Scholes BUA 90% of the market need is for 3 and 4 bedroom ones.

A greater proportion of 2 bedroom market homes are needed in HD9 1 and a smaller proportion of 3 bedroom homes. *According to these results, 2 bedroom affordable homes like the ones proposed by EcoHolmes are not needed in Scholes.*

9.7. The weighting factor for the household survey in Scholes BUA could not easily be determined due to the low response from the leaflet drops. *So again, where do the figures come from?*

9.12. We must note that the number of people living outside of the study area with a local connection will NOT be a small number. *EcoHolmes have used the "local connection" to allocate these houses. How are these going to be for Scholes residents given this statement. This is unacceptable and unfair to the Scholes residents!*

We have zero confidence in the results of this survey!

"Further analysis of the need for the affordable housing below will focus on modelled data using the basic needs assessment model BNAM, which turns the above snapshot information into annual needs and factors in several sources of supply."

Their conclusions are all based on a model and not local fact!

Kirklees Council replied to questions.

There are 23 households on the housing register with postcodes within Scholes and Hepworth. "Please be aware that the information regarding postcodes and addresses is not guaranteed to be accurate."

The council confirms they have a priority and bedroom required list, but will not release the information.

No one from Scholes or Hepworth on the housing register indicated a preference to be housed in the area, despite KC saying, *"We operate a choice based letting system where applicants register an interest for individual properties."*

There is no information held for a local connection to Scholes and Hepworth in accordance with the allocation policy.

"The Kirklees Housing Allocation Policy defines a local connection to the district, not to specific areas within the boundary. Therefore we will not hold this information."

These homes cannot be guaranteed to go to the local people of Scholes and Hepworth based on the allocation policy!

EcoHolmes didn't make it clear until February 2022 that these were affordable houses to be rented by a housing association. Many local residents believed them to be affordable homes to buy. It was also not publicised that they were to be built on Green belt. The "local connection" also now appears to be very misleading! There has been a lot of misleading information surrounding this project from the beginning.

There are 7 local brownfield sites which are registered on the Kirklees Brownfield Register, a number of these are relatively close to Holmfirth centre. These have access to local amenities and transport links. This would negate or lessen the use of personal vehicles and also encourage the use of bicycles due to the valley bottom routes. This would much more support Eco values!

Proving 'Local Connection'

EcoHolmes have stated numerous times that these homes will be for people with a 'proven local connection' and that for the first 10 lettings the Government 'will insist they use the Kirklees Housing Register, with the local connection filter applied, to identify local applicants'.

But reading Kirklees replies to their questions it seems that Kirklees Council doesn't hold this information for their housing register applicants?! So how can they identify those applicants with a local connection?!

Q4. Who will live here? Given that you are going to use the Council's housing register (waiting list), will they come from right across Kirklees?

The tenants who will live here will be from the local area. It will be **a planning condition that the homes can only be for affordable housing for local people**, and they must remain affordable in perpetuity. They will be for people with some level of housing need (i.e., living in unsuitable conditions for their household). We have evidence in a report from a professional housing supply consultant that a significant number of people in Scholes and nearby villages are in need of affordable housing if they are to live near where they have family connections. There is not a supply of such houses coming through the planning system in this area.

Local connection will need to be evidenced by applicants and this will be a pre-filter to identify potential tenants. For the first letting, the Government, who may supply grant funding to build the homes, **will insist we use the Kirklees Council's housing register, with the local connection filter applied, to identify local applicants.** Second lettings will usually have the same requirement for 50%, with the remaining re-lets available either through the choice-based letting system to people on the register, or via Rightmove (but the local connection will still be enforced!). EcoHolmes and its Housing Association partner will advertise extensively in the area for all lettings. From experience, the Housing Association know that local people will share news of availability of affordable homes with others in the community before they actually become available.

The Council's response to your specific questions is set out below:

A) Separately for the villages of Scholes and Hepworth please tell us:

1. how many applicants are resident in each village that are on the housing register?

There are a total of 23 households on the register with postcodes within this area. Please be aware that information regarding postcodes and addresses is not guaranteed to be accurate.

2. please provide a breakdown of priority and bedrooms required.

The Council can confirm that it does hold information falling within the scope requested, but is refusing to release this information, and I have attached the refusal notice which sets out the reasons why and the process of appeal against this refusal.

B) How many households are on the register as a whole have indicated a preference to be housed in a) Scholes b) Hepworth. Please provide a breakdown of priority and bedrooms required.

Households do not indicate a preference for area. We operate a choice based letting system where applicants register an interest for individual properties.

C) How many households are on the register as a whole have a local connection to a) Scholes b) Hepworth villages in accordance with your allocation policy? Please provide a breakdown of priority and bedrooms required.

The Kirklees Council Housing Allocations Policy defines a local connection as to the district, not to specific areas within the boundary. Therefore we would not hold this information.

D) Does the council have a list of households that are seeking affordable home ownership? If so please provide information of demand within the above areas, preferably indicating the affordable tenure required.

We do not hold this information.

Note the question "Does the council have a list of households that are seeking affordable home ownership." *Why ask this question when there are no plans for the properties to be available to buy?*

SOSGB Conclusion

5.10 Our key finding is that my client's proposal for 10 affordable dwellings is justified. The scale of unmet need in the Scholes BUA would justify a rural exception.

Based on our findings detailed in the previous pages, SOSGB disagree with the above (5.10).

We request that the HSN report and the figures/calculations within it are further investigated before the results are used to grant EcoHolme a 'rural exception'.