

Yvonne Parker
Programme Officer

SENT BY EMAIL

Dear Yvonne Parker,

**KIRKLEES LOCAL PLAN: STAGE 3 HEARINGS INSPECTOR'S MATTERS,
ISSUES AND QUESTIONS**

Thank you for consulting with the Home Builders Federation on the Kirklees Local Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

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 20 of the Inspector's Matters, Issues and Questions.

***Issue - Does the Plan set out positively prepared policies for securing high quality design and dealing with climate change, which are justified, effective and consistent with national policy?
[Policies PLP 24, 25, 26, 27, 28, 29]***

a) Does the Plan make sufficient provision for inclusive design and accessible environments in accordance with paragraphs 57, 58, 61 and 69 in the NPPF?

The HBF does not wish to comment on this question.

b) Are the sustainability requirements under criteria d iii and iv in Policy PLP 24 justified and deliverable?

The HBF is generally supportive of good design and sustainable development. However, this policy requires greater clarity. It is not clear whether each element set out in part d are mandatory or desirable. It is also not clear whether viability of development has been considered.

It is considered that the requirements under criteria d iii have potential to add significant costs to the delivery of housing development. The HBF considers that this requirement should be removed.

In relation to Part d iv, whilst the HBF does not generally object to encouragement to the inclusion of renewable energy and minimising resource use it is important that this is not interpreted as a mandatory requirement. This would be contrary to the Government's intentions, as set out in Fixing the Foundations and the Housing Standards Review, which specifically identified energy requirements for new housing development to be a matter solely for Building Regulations with no optional standards.

The Deregulation Act 2015 was the legislative tool used to put in place the changes of the Housing Standards Review. This included an amendment to the Planning and Energy Act 2008 to remove the ability of local authorities to require higher than Building Regulations energy efficiency standards for new homes. Transitional arrangements were set out in a Written Ministerial Statement in March 2015.

Again, the potential cost of the requirements set out in part d iv, needs to be taken into consideration. The HBF have highlighted issues with the viability and the deliverability of sites in earlier comments submitted as part of the examination and in response to the publication draft. There are concerns that requirements such as these could lead to the non-delivery of homes in areas where development is intended to be focused. The HBF considers that this requirement should be removed.

c) Should Policy PLP 26 refer to cumulative landscape and visual impacts as referenced in paragraph 97 of the NPPF?

d) Is the approach to wind turbine development in Kirklees clearly expressed in Policy PLP 26 and in line with the Written Ministerial Statement dated 18th June 2015 which sets out considerations to be applied to wind energy proposals?

e) Is the sequential approach to flood risk, as set out in Policy PLP 27, justified and in line with national guidance in the National Planning Policy Guidance (PPG)?

f) Is the target of 30% reduction in surface water run-off, as set out in criterion c in Policy PLP 28, justified and deliverable?

The HBF does not wish to comment on these questions.

Yours sincerely,

Joanne Harding
Local Plans Manager – North