

Matter 3 - Overall Housing Need

a) to e) CPRE's Core Evidence Paper (Dec 2016) explains our contention that the OAN calculations for Kirklees have been significantly inflated and are therefore not credible. We consider that any housing target in excess of 1,400 per year (25,000 over the plan period) would be contrary to national policy and planning practice guidance, and serve to undermine economic objectives within the plan to reduce worklessness.

CPRE strongly contest the figures presented and suggest an OAN based on an overly aspirational employment projection is both unsound and counter productive in economic terms. It cannot be justified by the available evidence and provides for a scenario of population growth, job growth and housing market growth that cannot reasonably be expected to occur; and it therefore inconsistent with national Planning Practice Guidance (ref 2a-003-20140306).

The headline OAHN figure masks the types, tenures and affordability of housing required to provide suitable and sustainable development. CPRE considers that the OAHN should be segmented to clarify the structure of housing need, to avoid confusion between need and demand, and crucially to make clear that affordable housing is not interchangeable with market housing in meeting the OAHN. If the OAHN is to properly inform the housing requirement, then it must be clear that providing the wrong type or price-point of housing does not amount to meeting need, even if the overall quantity of development is in line with the target.

g) It is too early to make informed adjustments to OAHN in the light of Brexit, certainly in terms of demographic implications. Clearly, however, it is very likely that there will be a period of economic instability that will render sustained growth throughout the plan period less likely. This makes ambitious growth scenarios, and associated in-migration to support a growing workforce, significantly less likely, and we consider a downward adjustment to the growth scenarios should be evaluated.