

## MATTER 3 – OVERALL HOUSING NEED

### Issue - Is the identified objectively assessed need of 31,140 dwellings soundly based and supported by robust and credible evidence?

#### Question

a) *Does the identified Kirklees Housing Market Area provide a robust and appropriate basis for assessing housing needs?*

1 We consider that Kirklees is an administrative entity, not a natural geography. It is an amalgam of very different settlements defined to meet the imperatives of the 1974 local government reorganisation. As such it is made up of distinct areas with very different demographic profiles and priorities. It also suffers residual tensions.

2 A more appropriate approach would be to recognise multiple not a single housing market.

b) *Do the demographic based projections in the Council's Strategic Market Housing Assessment (SHMA) (2016) (SD18) provide a suitable starting point for establishing objectively assessed housing need (OAHN)?*

3 No, as stated above, these are too blunt.

c) *Is the applied jobs growth uplift rate (based on projected growth of 23,000 jobs over the Plan period) soundly based and justified? In particular:*

- Are the economic assumptions underpinning this forecast, namely a 75% employment rate and 4.5% unemployment rate, achievable by 2031?*
- Why was the jobs growth SENS1 scenario used instead of the CORE scenario? How does this fit with the aim in the Plan and the Council's Economic Strategy (LE6) of achieving a 75% employment rate over the Plan period?*

[There is some overlap between Matter 3 and Matter 6 on economic matters. This question is included in this section in order to allow discussion on the link between housing and jobs]

1 No, as above. The Economic Strategy is considered flawed and has not been formally approved by the Council. The 75% target is not based on evidence and is an aspirational target (c.f. emails from Kirklees Council officers) which is probably not achievable based on recent performance.

2 The 4.5% unemployment rate includes a significant number of self-employed. And Single person businesses were omitted from surveys labour market and economic surveys.

- 3 The 4% - 6% unemployed rate represents full employment. Kirklees is not clear on where the extra jobs and workers come from.
  - 4 Other local authorities are known to be competing for the same jobs and workers and have had better records on job creation.
  - 5 There is no evidence of Kirklees' ability to attract new employers
  - 6 The Strategy fails to recognise the opportunities because of its backwards view fixated on traditional jobs.
  - 7 There is evidence of double counting as the ONS base line population growth figures includes migration for work purposes.
- g) Is there a need for any adjustments to OAHN in light of Brexit?*
- 1 Yes, clearly so. It also needs to contain flexibility for other economic events. Basing 15 year land supply targets and allocating land (which will be irreversible) on 5 years of data seems to be lacking in the objectivity on which the Plan is claimed to be based and short on real evidence. We would argue for a more flexible, organic approach.