

GEORGE F. WHITE



**SITE H49a: MATTER THREE**  
MATTERS, ISSUES AND QUESTIONS  
4<sup>TH</sup> SEPTEMBER 2017

HELEN BOSTON

1.0 **Introduction**

- 1.1 George F. White (Planning and Development) are instructed by Mr John Lund ('the Site Owner'), Site H49a (Land adjacent Brick Hill Farm, Oddfellows Street, Scholes, Cleckheaton) to submit representations to the Kirklees Local Plan; Stage 1 Matters, Issues and Questions, 10 July 2017.
- 1.2 The publication of the plan and the need to accommodate the new homes and jobs, within Kirklees up to 2031, is strongly supported.
- 1.3 In responding to the Matters, Issues and Questions Document, we have considered each of the questions and make representations only to those considered relevant at this time. We would also like to rely on the submissions to date, which for ease of reference has been appended to this submission.
- 1.4 We welcome the opportunity for further engagement and the opportunity to appear at the Examination in Public.
- 1.5 We trust that you will confirm that these representations are duly made and will give due consideration to these comments.
- 1.6 Please do not hesitate to contact us to discuss any issues raised in this Representation further.

2.0 **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?**

### 3.0 Questions

- a) Does the identified Kirklees Housing Market Area provide a robust and appropriate basis for assessing housing needs?
- 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)?
- 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]
- d) Are the headship rates applied in the SHMA justified and based on robust evidence?
- e) Does the assessment of OAHN in the SHMA take sufficient account of i) market signals, and ii) backlog in delivery, in line with advice in the Planning Practice Guidance (PPG)?
- f) Should the assessment of OAHN take account of Un-attributable Population Change?
- g) Is there a need for any adjustments to OAHN in light of Brexit?

- 3.1 Having reviewed the Council supporting evidence we support the proposed methodology and figure proposed by the Council.
- 3.2 We would like to take this opportunity to highlight that Table 3.6 of the SHMA has set out the first choice destination of households planning to move in the next five years. Batley and Spen, the area of which Site H49a is situated is the number one destination with over 18% of people wanting to locate here.
- 3.3 Site H49a will provide up to 48 units which will not only provide a mix of house types and tenures in line with the SHMA and Policy PLP 11 but will also bring economic benefits in line with the National Planning Policy Framework. The Councils Sustainability Appraisal Report Annex 1 states that development of Site H49a will have;
- 3.4 *"Potential significant positive effects were identified for this site in relation to SA objectives 1: employment, 3: education, 8: leisure and recreation".*
- 3.5 The site also, as identified by the Council, has very few site constraints.

- 3.6 We wish to take this opportunity to confirm that following some initial site promotion there is some interest in the site, and in line with the Councils projected deliverability this site will be both deliverable and achievable within 0-5 years.

#### 4.0 **Conclusion**

- 4.1 Whilst the Local Plan will be examined by the Inspector, who will ultimately conclude whether the plan has been prepared with the Duty to Cooperate, legal and procedural requirements and sound. We are satisfied that the Plan the Inspector is being asked to consider is positively prepared and justified, effective and consistent.

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