

GEORGE F. WHITE



SITE H49a: MATTER FOUR
MATTERS ISSUES AND QUESTIONS
4TH 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 4 – Housing land supply and delivery**

Issue – Is the identified overall housing requirement in the Plan (31,140 dwellings) justified, deliverable and consistent with national policy?

3.0 Questions

a) What are the Council's reasons for seeking to deliver full OAHN in Kirklees? Is the approach justified, and in line with paragraph 14 in the NPPF? Has the Council considered whether an uplift should be made in market housing to provide additional affordable housing?

b) Should the overall housing requirement of 31,140 dwellings in the Plan be expressed as a minimum rather than an approximate figure? Should the requirement be included in a policy?

3.1 It is our opinion that the plan should remain flexible in terms of the total housing requirement, and that it should made clear that the projected number is a minimum and not a ceiling. We do however consider that the requirement for review is a requirement which should be included within the policy.

c) Housing completions and commitments data in Table 5 of the Plan has been updated in the Housing Supply Topic Paper (July 2017) for 2015/16. What is the effect on the windfall allowance and demolition allowance in the Council's supply calculations? What are the implications for overall housing delivery and the Council's five year housing land supply? Will a five year supply be provided on adoption and maintained over the Plan period? Does the Plan allow sufficient flexibility to respond to changing circumstances?

d) Can the Council confirm the contribution the different sources of housing supply are likely to make each year over the Plan period? (e.g. the figures which have informed the housing trajectory graph in the Plan)? Should this information be included in the Plan alongside the graph?

e) Is the Council's approach to calculating five year land supply robust and in line with national policy and guidance? Should the Plan include reference to the Council's assumptions and parameters and the five year supply position?

f) What are the main risks and potential barriers to the delivery of the housing requirement in Kirklees over the Plan period?

g) Is the application of a 10% lapse rate to outstanding planning permissions justified and supported by the evidence? Should a lapse rate also be applied to allocations?

h) Is the windfall rate of 450 dwellings per annum justified and supported by local evidence?

- To what degree is this figure based on large windfall sites (0.4 hectares or more), and what are the reasons for the inclusion of this element? Is the information on large potential housing sites in the SHLAA and other evidence sources sufficiently comprehensive? Does the Plan allocate all known large potential housing sites within existing built-up areas?**

- Does the use of a large windfall rate create issues of double counting with outstanding permissions on large sites and allocations within urban areas in the period 2020-2031?
- Is the application of the windfall rate from 2020/21 justified and reasonable?
- To what degree have historical windfall rates been influenced by the availability of housing allocations and other site-specific opportunities in the area?

i) How many empty homes have been brought back into use in the borough in recent years? Does the Council have a projected figure or target for future supply from this source?

j) Are the estimated delivery and phasing rates from site allocations in Appendix 3 of the Plan robustly based and justified? In particular:

- Are the standard lead-in times and build out rates (as set out in Tables 9 and 10 in the Council's Housing Technical Paper) justified by local evidence? [in responding the Council is requested to pick up on points raised by representors to the Publication Draft Local Plan, including the research undertaken by Nathaniel Lichfield (submission on behalf of KeyLand Developments Ltd)]
- Have the standard lead-in times been applied to all sizes of schemes?
- Is the standard net density of 35 dwellings per hectare (dph) justified by local evidence? Why has this approach been adopted?

k) Does the Plan provide sufficient clarity regarding the total number of dwellings which are proposed for allocation? Should the figure be included in a policy?

3.2 Yes. We support the evidence put forward by the Council, which we believe is clear.

3.3 We do not consider that the figure should be included within the policy. The total number of dwellings proposed for allocation is not a ceiling and it would be our opinion that to include them would be of detriment of supporting sustainable development throughout the plan period. As we have already set out due to a degree of different factors, it is important that the housing figures are reviewed early on in the plan period. The plan should allow for this flexibility.

l) Has sufficient flexibility been provided in the housing trajectory? Should an additional buffer be applied to ensure that the overall housing requirement is met and exceeded?

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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