

Matter 4 - Housing Land Supply and Delivery

a) and b) The housing requirement should articulate the types and tenures of housing required in different places to achieve sustainable place-making. Otherwise, there is no way to ensure that the right development takes place in the right places.

Crucially, there is no evidence that uplifting market housing would increase delivery of affordable housing, because uptake of market housing cannot exceed demand, and this will inevitably compromise the viability of affordable delivery in market housing schemes. Our proposed segmented supply would address the issue effectively. This would be achieved by specifying the mix of types and tenures for each site at the allocation stage.

c) and d) The Housing Trajectory should clearly show a series of years in which the anticipated rate of housing completions will be sufficient to implement the plan target. Otherwise there is no relationship between the trajectory and the monitoring of performance that informs the ongoing calculation of 5-year land supply. The trajectory graph as presented is a hypothetical rate at which sites may become available for development, rather than a profile of the rate at which housing will be delivered. As such it is meaningless.

g) We do not consider that increasing the total allocations to allow for a lapse rate would be appropriate. In particular, this would raise the question of what should happen to lapsed allocations, especially if they have been drawn from Green Belt changes. Should they return to their previous status, in which case there would be additional need for Green Belt reviews; or should they trigger a selective review of the Plan as a whole? Given our view that the housing requirement is exaggerated in any case, a much more useful approach would be to implement a three-phase approach to housing supply, in which locations are identified for *possible* allocations to fulfill the year 11-15 supply, but the sites are only allocated if delivery is on-trajectory and brownfield windfalls are insufficient.

h) The plan assumes that windfall sites should not contribute to the 5 year housing supply. This contradicts the evidence of windfall as a reliable, ongoing source of supply - especially with the relaxation of permitted development rights on offices and other buildings to residential. Historically, windfall sites have accounted for the majority of housing completions since 2001. The extensive proposed new land allocations undermine the focus on urban re-development in Kirklees, despite commendably high brownfield development rates in recent years.

It is CPRE's view that the plan cannot be considered sound without it being based on up-to-date evidence that includes a brownfield register, especially when this has historically provided a rich resource for windfall sites to housing supply.