



## Kirklees Local Plan Examination Stage 1 – Initial Hearings

### Matters, Issues and Questions (MIQs)

#### 1.0 INTRODUCTION

- 1.1 This statement has been prepared by WYG on behalf of the Church Commissioners for England (herein referred to as “our client”) who have an interest at Leeds Road, Chidswell. By way of reference, our client’s land is referred to as *Land East of 932-1110 Leeds Road, Shawcross/Woodkirk, Dewsbury* (Draft Allocation Reference MX1905).
- 1.2 Our client’s site has been identified to deliver 1,535 dwellings, and 122,500sqm of employment development during the Plan period. They are therefore very keen to engage and assist in the preparation of a sound Local Plan which is positively prepared, justified, effective and consistent.
- 1.3 This response seeks to address the key issues to be discussed at the forthcoming Kirklees Local Plan Examination Stage 1- Matter 4 – Housing Land Supply and Delivery.
- 1.4 The response is structured such that it follows the questions posed in the Matters and Issues agenda and should be read in conjunction with the representations by WYG on behalf of our client to the Publication Draft Local Plan in December 2016.

#### 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?**

##### **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?**

##### **Reasons for seeking to deliver the full OAHN in Kirklees**

- 2.1 The NPPF requires local planning authorities to identify Objectively Assessed Housing Need (OAHN) and that Local Plans translate those needs into land provision targets. Paragraph 47 of the NPPF states that to boost significantly the supply of housing, local planning authorities should:
- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*
- 2.2 Therefore, the reason for seeking to deliver the full OAHN in Kirklees is to comply with national policy, which we support.

##### **Approach**

- 2.3 Paragraph 14 of the NPPF states:

*"At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking*



For **plan-making** this means that:

- local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted.”

2.4 The Council has identified its development needs through the preparation of an evidence base. The scenarios tested in its Strategic Housing Market Assessment (October 2016) (SD22) align with its Employment Technical Paper (April 2017) (SD18). There is also cross reference in SD18 to its wider economic objectives set out in the Kirklees Economic Strategy (LE6) and Leeds City Region Strategic Economic Plan (CR9).

2.5 Therefore, the Council’s evidence on its development needs is adequate, up-to-date and relevant. SD22 summaries at page 13 that:

*There are many factors to consider when establishing an Objectively Assessed Housing Needs figure and after considering this evidence it is proposed that the Objectively Assessed Housing Need in Kirklees for the period 2013-31 is 1,730. This takes into account:*

- A baseline dwelling requirement based on 2014-based CLG household projections (plus an allowance of 4.2% for vacant properties) of 1,584 dwellings each year; and
- A need to deliver additional dwellings to support jobs growth.

2.6 The Local Plan is planning positively to meet the development needs of the area identified in the evidence base referred to above. The Council has also assessed the development capacities of those sites and has established that it does not have enough land (outside the Green Belt) to meet its objectively assessed needs in full. Therefore, exceptional circumstances exist to review the Green Belt, in accordance with paragraphs 83 and 84 of the NPPF.

2.7 The Council’s approach is therefore justified and supported.

**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?**

2.8 Table 5 (meeting the housing requirement) of SD1 sets out the overall housing requirement for the plan period, namely 31,140 dwellings. We would have no objection for the requirement to be included in a policy.

2.9 This could be through the creation of a new policy, or, for example, the inclusion in an existing policy. The most suitable existing policy appears to be Policy PLP3 (Location of Development).

2.10 We would suggest that part 2 of PLP3 could be amended as follows:

*"2) Development will be permitted where it supports the delivery of housing (31,140 dwellings) and employment growth in a sustainable way,....."*



- j) Are the estimated delivery and phasing rates from site allocations in Appendix 3 of the Plan robustly based and justified<sup>3</sup>? In particular:**
- a. 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)*]**
  - b. Have the standard lead-in times been applied to all sizes of schemes?**
  - c. Is the standard net density of 35 dwellings per hectare (dph) justified by local evidence? Why has this approach been adopted?**
- 2.11 In the case of MX1905, please refer to our Statement of Common Ground which sets out the projected delivery rates from the site. We would suggest that Appendix 3 is amended to reflect this agreed position between our client and the Council.
- 2.12 We can confirm that the whole of the 1,535 dwellings is still deliverable within the Plan period, albeit with a slightly amended housing trajectory for the site to allow for the Local Plan to be adopted, and an appropriate lead in time for the site to be brought forward through the planning application process.
- 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?**
- 2.13 In the context of MX1905, the Plan does refer to the total number of dwellings which are proposed for allocation, namely 1535 dwellings. This is what the indicative masterplan is based on and which we support.