

# Kirklees Local Plan Examination Hearing Statement

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**Our ref** 50579/JG/AJk  
**Date** September 2017

**Subject** **Matter 5 Hearing Statement on behalf of Persimmon Homes West Yorkshire - Other Housing Requirements**

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## **1.0 Introduction**

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Persimmon Homes West Yorkshire and responds to the questions set by the Inspector in relation to Matter 5.
- 1.2 This Hearing Statement should be read in conjunction with our representations submitted during the Local Plan Consultation (2016) on behalf of Persimmon Homes (Lichfields representor ID: 969464, Persimmon representor ID: 975291).

## **2.0 Issue – Have affordable housing needs, traveller accommodation needs and the housing needs of other groups been satisfactorily assessed and addressed in the Plan, in line with national policy?**

### **Affordable Housing**

#### **Question (a) – Has the need for affordable housing been adequately assessed in the SHMA?**

- 2.1 The 2016 SHMA has identified an affordable housing need of 1,049 dpa. Assuming a 20% affordable housing requirement, this would result in an overall annual need for 5,245 dpa - a figure that is extremely unlikely to be achieved in the District, given that this is close to double the number of net additional dwellings Kirklees delivered at the peak of the housing market.
- 2.2 Despite identifying the need for 1,049 affordable dwellings per annum, the SHMA has not allowed for any adjustment to the identified housing need to reflect this level of affordable housing need. We consider that this is a serious misjudgement.
- 2.3 As explained in Lichfields' Headroom Report (Annex 1 of our Matter 3 Hearing Statement), the scale of affordable housing needs, when considered as a proportion of market housing delivery, implies significantly higher levels of need over and above the OAHN figure. It is considered that to make a meaningful contribution to addressing the very high level of affordable housing need identified by arc4 (1,049 dpa), a further 10% uplift should be applied. This would increase the OAHN to 2,053 dpa (including also the 5% uplift to account for market signals and factoring in long term migration rates, as set out in our Headroom Report), significantly above the Council's current housing target of 1,730 dpa.

**Question (b) - What is the total net need for affordable housing over the Plan period? Should the Plan contain specific reference to this figure?**

- 2.4 As referred to above in our response to question (a), the total net need for affordable housing over the plan period is 18,882 dwellings (1,049 x 18). However, given the issues of accurately combining the OAHN and affordable housing need calculations, there is perhaps no need to reference a specific figure within the Plan. We would though advocate that an uplift be applied to the OAHN to account for the significant affordable housing need in Kirklees, as discussed above.

**Question (d) - Is the proposed rate of 20% affordable housing (on sites of more than 10 units) supported by the Council's viability evidence, in terms of both market housing schemes and developments with self-contained units designed for retirement living and people with specific accommodation needs?**

- 2.5 Persimmon commends the proposed shift away from an affordable housing policy based on a percentage of gross internal floor-space and consider that the proposed policy offers much more transparency. However, it is noted that the Home Builders Federation (HBF) has raised concerns regarding the viability of this policy requirement in value areas 4 and 5.
- 2.6 Persimmon has specific examples where it has been agreed with officers at Kirklees Council and the District Valuer's office (such as during the consideration of applications 2014/92214 and 2016/92055) that it has not been viable to deliver the requested 20% affordable housing. The level of affordable housing that can be achieved is site specific and based on abnormal constraints (i.e. underlying ground conditions, challenging topography, diversion of overhead cables) which reduce the achievable densities of development and therefore, impact upon the viable level of affordable housing. The wording of Policy PLP 11, which allows for a lesser amount of affordable housing provision where viability evidence demonstrates that there are development costs which would otherwise prejudice the implementation of the proposal, is therefore supported.

**Housing Mix****Question (n) - Is the requirement in Policy PLP 11 to seek a broad mix of housing from all proposals justified and deliverable?**

- 2.7 The requirement to seek a broad mix of housing from all proposals is considered to be justified. It will be deliverable as long as the policy remains sufficiently flexible to allow housing mixes to be provided which are in accordance with current needs, which are likely to evolve over the plan period.

**Question (o) - What conclusions does the SHMA reach in terms of the mix of housing size, type and tenure needed in the borough? Should the evidence in the SHMA be used to determine mix in residential schemes, or is there a need to have regard to other sources of information?**

- 2.8 The evidence in the SHMA regarding the requirement for housing size, type and tenure represents a snapshot in time, and should not be transferred verbatim into the Plan. The market is often best place to decide on what housing mix will be successful in a particular locality. A rigid housing mix which is set within a policy may ultimately render schemes unviable and restrict the supply of housing.

**Question (p) - Is the second paragraph of Policy PLP 11 seeking to impose optional Building Regulations<sup>4</sup> or additional technical requirements relating to accessibility? If so, what proportion of new dwellings should comply with the standards? Is the approach supported by viability work and local evidence on the need for accessible and adaptable dwellings and wheelchair user dwellings?**

- 2.9 The policy as set out in the Publication Draft Local Plan is supported as it seeks to meet the needs of the local community. The implementation of any additional standards must not, however, negatively impact upon the delivery of housing within the area. The viability implications of any additional policy requirements would need to be thoroughly tested. Therefore, such requirement for additional provision beyond what is set out in the Building Regulations would not be justified without further evidence as identified within the PPG (ID 56-007). If the introduction of optional Building Regulations or additional technical requirements is justified then flexibility would be required in their application, to enable local and site specific needs and constraints to be taken into account.

**Question (q) - Does the Plan make appropriate provision for the housing needs of older people and other groups in the community?**

- 2.10 Proposed Policy PLP 11 sets out that:
- 2.11 *“All proposals for housing must provide a broad mix of housing suitable for different household types which reflect changes in household composition in Kirklees in the types of dwelling they provide, taking into account the latest evidence of the need for different types of housing. This includes consideration of provision for those with specialist needs. For schemes of more than 10 dwellings or those of 0.4ha or greater in size, the housing mix should specifically reflect the proportions of households that require housing and achieve a mix of house size and tenure.”*
- 2.12 Persimmon agrees that a mix of housing needs to be delivered, although the mix needs to be responsive to the market to ensure that local requirements are being met. For example, the provision of bungalows as part of the affordable housing mix would contribute towards meeting the needs of older people.