

Kirklees Local Plan Examination Hearing Statement

Our ref 50511/JG/AJk
Date September 2017

Subject **Matter 5 Hearing Statement on behalf of KeyLand Developments Ltd
- Other Housing Requirements**

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of KeyLand Developments Ltd and responds to the questions set by the Inspector in relation to Matter 5.
- 1.2 This Statement should be read in conjunction with our representations submitted during the Local Plan Consultation (2016) on behalf of KeyLand (representor ID: 969464). KeyLand Developments is the property trading business of the Kelda Group and a sister company of Yorkshire Water. It has control over site H596 and has promoted the site for housing development.

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 our 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.