



31 August 2017
Consultee ID: 941843/942144
Matter 5

Kirklees Local Plan Examination

Matter 5 – Other Housing Requirements

This statement is prepared by WYG Planning Limited (WYG) on behalf of our client Strata Homes (Yorkshire) Limited ('Strata' or 'our client').

WYG submitted representations on behalf of Strata in relation to the Publication Draft Kirklees Local Plan in December 2016 which focused on the decision of Kirklees Council to include as a housing allocation a site known as land between Richmond Park Avenue and Sunnyside Avenue, Roberttown (Local Plan SHLAA Ref No H442).

This response seeks to address the key issues to be discussed at the forthcoming Examination Hearing concerning Matter 5. Please refer to our Hearing Statements to other matters which provides further details on our client's interest in this site.

Our 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 we have previously submitted on behalf of our client.

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?

Policies PLP 11, 12

Affordable Housing

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?

We think this proposed rate will be difficult to achieve as evidence suggests from the Council's CIL Study that a large proportion of the district would generate values that would be unviable if a 20% affordable housing requirement is imposed.

f. Does the Plan provide a clear definition of affordable housing which accords with national policy and reflects the Government's proposals in relation to Starter Homes? Is the Council's proposed modification SPMM28 necessary to ensure the Plan is sound?

Having regard to the recent publication of the Housing White Paper – 'Fixing our Broken Housing Market' the promotion of Starter Homes by the Government will need to be reflected in the revised definition of affordable housing in the Local Plan.

Housing Mix

n. Is the requirement in Policy PLP 11 to seek a broad mix of housing from all proposals justified and deliverable?



We agree that there is a need for a broad mix of housing types, sizes and tenures. It is, however, important to recognise that the policy is flexible to reflect the need and demand will vary from site to site and over time. As such, the policy should not be overly prescriptive as this could compromise housing delivery.

o. What conclusions does the SHMA reach in terms of the mix of housing size, type and tenure need 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?

As set out in our response to Question (n) above, the needs and requirements of the sites as well as market demand will vary over time and it would be inappropriate for the conclusions reached within the SHMA to be rigidly upheld as a policy requirement although clearly they provide a useful context and starting point.

The emphasis on the SHMA is to consider housing need and does not reflect strategic objectives of the Local Plan one of which is to support growth and diversification of the economy and in order to fulfil this objective, it will require housing types to attract the economically active workforce.

In Paragraph 8.24 of the SHMA it confirms that from a detailed analysis of the current and future profile of households the three key dwelling types required across Kirklees are:

- Three bedroom houses
- Four plus bedroom houses
- One to two bedroom houses.

Site H442 would be able to deliver a mix of house types that would predominantly reflect this need whilst benefiting and supporting the local economy.

Whilst site H442 is able to satisfy the key dwelling requirements having regard to the SHMA, the actual mix should be informed by more local information that can be applied to that particular market area. This would require information from other sources at the relevant time and therefore using the SHMA conclusions to determine the mix would be too standardised in approach.