

Calderdale Council
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SENT BY EMAIL
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06/10/2022

Dear Planning Policy Team,

CALDERDALE LOCAL PLAN: MAIN MODIFICATIONS

1. Thank you for consulting with the Home Builders Federation (HBF) on the Calderdale Local Plan Main Modifications.
2. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing.

MM5 – Table 6.1

3. The HBF notes the modification to Table 6.1 to amend the housing requirement to 14,950 dwellings between 2018/19 to 232/33, giving an average annual housing requirement of 997 dwellings per annum. The HBF considers that this increase in housing requirement is an improvement, however, it remains unclear as to why the Council did not choose just to take forward the 1,040dpa proposed by the Turley evidence. If the Council have concerns around the certainty of the figures used to determine this figure in the longer term this could be addressed during a future review of the Plan to determine if the housing requirement is still appropriate.

MM7 – Table 6.2

4. There appears to be a typographical error in relation to the stepped trajectory which suggests there will be eight years at 500 dwellings per annum (dpa), two years at **900**dpa, and five years at 1,810dpa. This does not add up to the total requirement for 14,950 dwellings and differs from the policy modification which suggests there will two years at **950**dpa.

MM8 – Policy SD3

5. The HBF notes the modification to Policy SD3 to amend the housing requirement to 14,950 dwellings between 2018/19 to 232/33, giving an average annual housing requirement of 997 dwellings per annum, and introducing the stepped housing requirement. The HBF considers that this increase in housing requirement is an



improvement, however, it remains unclear as to why the Council did not choose just to take forward the 1,040dpa proposed by the Turley evidence. If the Council have concerns around the certainty of the figures used to determine this figure in the longer term this could be addressed during a future review of the Plan to determine if the housing requirement is still appropriate.

6. The HBF remains concerned by the use of the stepped approach, this is not considered to be addressing the housing need in the borough and it is not considered to provide an appropriate balance between housing and employment growth. It appears this stepped housing requirement is intended to reduce the backlog in housing supply at the start of the plan and is being used by the Council as a way of achieving a five-year land supply position on adoption. It is important to remember that this is not just a theoretical mathematical numbers exercise but represents actual households in housing need today, so it is unreasonable and unequitable to expect them to wait until later in the plan period before their current housing needs are addressed.
7. The Council have sought to reduce the housing requirement at the later end of the plan period to reflect uncertainty in the economic assumptions, and thereby lower the average annual housing requirement to 997dpa, they are now looking to reduce the initial housing requirement further through a stepped approach and actually increasing the housing requirement at a time when the Council considers there is the greatest uncertainty. The 500dpa figure proposed until 2025/26 is significantly less than the 1,040dpa needed to meet the economic growth. Whilst the Council suggest that these figures are not a 'ceiling', it is not apparent what the Council will be doing in terms of supply or action to encourage homes to be delivered at a level more akin to the need. The HBF does not consider the stepped trajectory to be justified and would continue to recommend that further sites should be allocated for delivery in the first five years of the plan.

Future Engagement

8. I trust that the Council will find these comments useful as it continues to progress its Local Plan to adoption. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.
9. The HBF would like to be kept informed of adoption of the Local Plan and any consultations on associated documents. Please use the contact details provided below for future correspondence.

Yours sincerely,



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