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SENT BY EMAIL  
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24/02/2020

Dear Sir / Madam,

## **CALDERDALE LOCAL PLAN: HOUSING REQUIREMENT UPDATE AND POTENTIAL SUPPLY**

Thank you for consulting with the Home Builders Federation on the Calderdale Local Plan Housing Requirement Update and Potential Supply consultation.

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.

It is noted that within her Post Hearing letter (INS07) the Inspector has stated that she is concerned that the Plan's provision for housing, would not adequately support the employment growth advanced by the Plan.

It is also noted that at a meeting on 14<sup>th</sup> October 2019 the Council's Cabinet considered three options to identify the housing requirement and resolved that 997 dwellings per annum was an appropriate housing requirement.

The Modelling the economic implications of the proposed housing requirement report produced by Turley in 2019, identified a requirement of 1,040 dwellings per annum (dpa) to support the 'policy-on plus transport' economic growth forecast. However, the Council have decided to apply the 'policy-on plus transport' (1,040dpa) for the first 10 years to 2027/28 and the 'baseline growth' scenario (910dpa) for the period 2028/29 to 2032/33. Thus, giving a figure of 14,950 overall, equating to an average of 997dpa.

The HBF consider 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.

### **Sources of Housing Supply**

Table 2 suggests that there are:

- 1,888 extant planning permissions;
- 1,294 windfalls
- 11,882 allocations (an increase of 2,422 dwellings from the Publication version)

This suggests there is a land supply for a potential 15,064 homes, this is 114 more homes than the housing requirement of 14,950.

#### Extant planning permissions

1,888 dwellings have been included within the supply from extant permissions not including outline permissions. The HBF are supportive of the use of a 10% discount for sites with planning permission of less than 10 units and the recognition that some permissions will lapse or not be renewed. For proposals of 10 or more dwellings officers have made a judgement using available intelligence to ascertain the likeliness of the scheme coming forward. Whilst the HBF support the Council in making these judgements, it still may be beneficial to include a level of discount to ensure that unforeseen events are also taken into consideration.

#### Windfalls

1,294 dwellings have been included within the supply from windfalls. Whilst the HBF acknowledges the previously the Council has had a healthy level of development from windfall sites, it is considered that this level of delivery will reduce over future years as the sites allocated in the Local Plan and identified in the SHLAA come forward.

The HBF are supportive of not including an allowance for windfalls in the first three years of the Plan.

#### Allocations

As previously, the number of proposed allocations do not allow for flexibility in the supply, or for slippage in the delivery of sites. It would only require a small proportion of the sites not to come forward or for the windfalls to drop off slightly, for the housing requirement to not be met. Whilst the HBF do not wish to comment upon the acceptability or otherwise of individual proposed allocations. The HBF would recommend that a greater number of sites are allocated to provide a buffer over and above those required to meet the plan requirement. The reason for the application of a buffer of sites is two-fold. Firstly, the plan housing requirement should be identified as a minimum to conform to the NPPF requirements to boost supply and plan positively. It therefore stands to reason that the plan should seek to surpass this requirement. Secondly, a buffer will provide a balance against the inevitable under or non-delivery from some existing commitments or proposed allocations.

### **Future Engagement**

I trust that the Council will find these comments useful as it continues to progress its Local Plan. I would be happy to discuss these issues in greater detail or assist in facilitating discussions with the wider house building industry.

The HBF would like to be kept informed of the progress of this document. Please use the contact details provided below for future correspondence.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'J. Harding', with a stylized flourish at the end.

**Joanne Harding**

**Local Plans Manager – North**

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