

Hearing Statement – Matter 15

Kirklees Local Plan

On behalf of Miller Homes

November 2017



I. Introduction

- 1.1. This is a Written Statement prepared by Spawforths on behalf of Miller Homes in respect of:
 - Matter 15: Infrastructure Delivery
- 1.2. Miller Homes has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- 1.3. The Inspector's Issues and Questions are included in **bold** for ease of reference. The following responses should be read in conjunction with Miller Homes' comments upon the submission version of the Kirklees Local Plan, dated December 2016.
- 1.4. Miller Homes has also expressed a desire to attend and participate in Matter 15 of the Examination in Public.

2. Matter 15 – Infrastructure Delivery

Issue – Does the Plan set out a robust framework for infrastructure delivery which is justified, effective and consistent with national policy?

- a) **Does the Council's Infrastructure Delivery Plan (IDP) (2015) and Addendum (2016) provide a thorough assessment of needs and costs, and reflect the levels of growth proposed in the Local Plan?**

- 2.1. Miller Homes is engaging with the Council and has undertaken significant investigations into delivering and enabling a highway which will perform the role and function of a strategic road for Dewsbury and Ravensthorpe, which will be a catalyst towards economic growth and change in the area, whilst forming part of the strategic urban extension to the south of Dewsbury.
- 2.2. Miller Homes is encouraged by the identification of the Mirfield to Dewsbury to Leeds (including North Kirklees Growth Zone) corridor (TS5) and the broad notation on the Proposals Map. However, Miller Homes is concerned that this misses the opportunity to identify and deliver a strategic highway through Dewsbury Riverside – the Dewsbury Riverside Strategic Route (DRSR), which will remove congestion and aid regeneration. This concern is amplified when reviewing Site TS5 in the Infrastructure Delivery Plan which states that TS5 “addresses local congestion issues and the associated impact of a large housing allocation to the south of Dewsbury”. This allocation misses the strategic opportunity of a Dewsbury Riverside Strategic Route. The strategic highway through Dewsbury Riverside has been modelled and has been shown to benefit the communities of Ravensthorpe and Dewsbury and has been shown to reduce congestion along the A644 and will also assist in the regeneration of Ravensthorpe and Dewsbury. The Infrastructure Delivery Plan similarly underplays the strategic role of a route through Dewsbury Riverside.
- 2.3. Jointly commissioned traffic modelling indicates that 2,000 dwellings can be occupied at Dewsbury Riverside before significant additional off-site highways capacity is needed. The additional off-site highways capacity in the A644 corridor is referenced as a new strategic

intervention. One option for this is a new road connection running from A644 at Low Mill Lane, crossing the river Calder and railway line, then connecting with and running through the site and onwards to Dewsbury town centre via Forge Lane and Savile Road. This scheme is known as the Dewsbury Riverside Strategic Route (DRSR)

2.4. Given the likely delivery rates for the development, the strategic intervention required at circa 2,000 units will be needed towards the end of the plan period in 13 to 14 years.

2.5. Miller Homes commissioned Arup to carry out a review into the engineering feasibility of a potential new bridge which would form a key part of the DRSR. The new bridge would span the River Calder and the railway line. The Arups feasibility review concluded that the proposed structure is deliverable.

2.6. **These investigations have shown that the road can be delivered, that it reduces congestion along the A644 and have benefits in terms of journey time savings.**

2.7. This highway scheme is an option for creating additional capacity on the network and resolving traffic congestion issues in the area. As a highway option for Dewsbury the highway scheme should therefore be identified in the Plan.

2.8. The route of the strategic highway through Dewsbury Riverside should therefore be identified in the Infrastructure Delivery Plan to allow for the delivery of this economically significant road scheme. The baseline evidence that Miller Homes has undertaken demonstrates that the road can be delivered in this corridor.

b) What transport modelling work has been undertaken, and has it taken account of: i) the potential impact on the local highway infrastructure outside Kirklees, and ii) cumulative effects arising from growth in other nearby local authorities?

2.9. The Council has undertaken extensive transport modelling work to support the Local Plan and this is summarised in their Technical paper and Addendum: Transport Model (April 2017). The report sets out details of the modelling work including: information on building the model; the methodology adopted; the assumptions used for forecasting future travel

demand; the model tests undertaken; and a summary of the key results with the Council's conclusions and recommendations.

- 2.10. It is considered the potential impact on the local highway infrastructure outside Kirklees has been taken into account. The report defines the extent of the modelled networks and shows roads outside Kirklees are included, allowing the effects of Local Plan developments outside Kirklees to be assessed.
- 2.11. It is also considered that the transport modelling does take account of cumulative effects arising from growth in other nearby local authorities. Section 3 of the Council's Transport Model report (April 2017) sets out at its paragraph 3.5 that, outside the Kirklees area, the forecasts contained within the DfT's National Trip End Model are used to take account of changes in population and employment.
- 2.12. i-Transport (on behalf of Miller Homes) and Kirklees Council have undertaken further modelling of the specific impacts of the Dewsbury Riverside development and this has been used to determine a phased access strategy for the site, also taking account of the indicative development trajectory. This modelling used the Council's model but with refinement in the South Dewsbury area. Thus this modelling takes account of cumulative effects and the impacts of the development on adjacent local authority areas can be identified in detail as planning applications for development on the site are progressed.

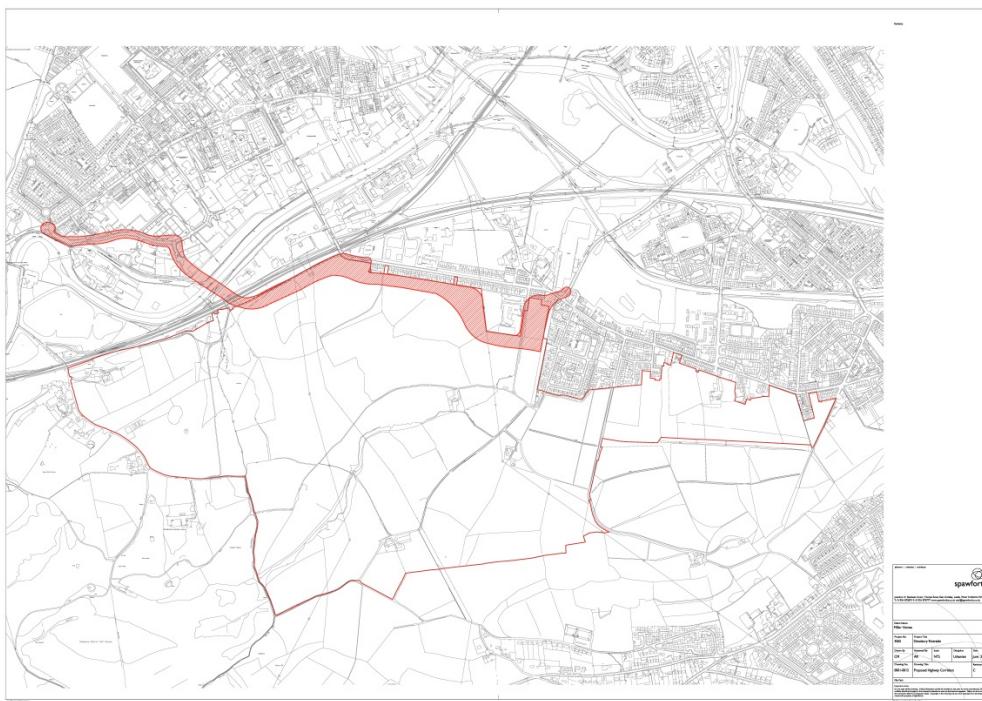
c) How will the necessary highway capacity improvement schemes in the IDP be funded? (beyond those identified in Highways England's Road Investment Strategy)

- 2.13. Miller Homes has no specific comment in relation to this issue.

- d) Do Parts 1 and 2 of the Plan clearly identify essential infrastructure needed to deliver development? Are the transport improvement schemes listed in section 10.1 in Part 1 of the Plan and chapter 7 in Part 2 of the Plan justified by the Council's evidence base and internally consistent? Are the Council's proposed modifications SPMM18 – SPMM21 necessary to ensure that the Plan is sound?**

- 2.14. Miller Homes is engaging with the Council and has undertaken significant investigations into delivering and enabling a highway which will perform the role and function of a strategic road for Dewsbury and Ravensthorpe, which will be a catalyst towards economic growth and change in the area, whilst forming part of the strategic urban extension to the south of Dewsbury.
- 2.15. Miller Homes is encouraged by the identification of the Mirfield to Dewsbury to Leeds (including North Kirklees Growth Zone) corridor (TS5) and the broad notation on the Proposals Map. However, Miller Homes is concerned that this misses the opportunity to identify and deliver a strategic highway through Dewsbury Riverside – the Dewsbury Riverside Strategic Route (DRSR), which will remove congestion and aid regeneration. This concern is amplified when reviewing Site TS5 in the Infrastructure Delivery Plan which states that TS5 “addresses local congestion issues and the associated impact of a large housing allocation to the south of Dewsbury”. This allocation misses the strategic opportunity of a Dewsbury Riverside Strategic Route. The strategic highway through Dewsbury Riverside has been modelled and has been shown to benefit the communities of Ravensthorpe and Dewsbury and has been shown to reduce congestion along the A644 and will also assist in the regeneration of Ravensthorpe and Dewsbury. The Infrastructure Delivery Plan similarly underplays the strategic role of a route through Dewsbury Riverside.
- 2.16. Jointly commissioned traffic modelling indicates that 2,000 dwellings can be occupied at Dewsbury Riverside before significant additional off-site highways capacity is needed. The additional off-site highways capacity in the A644 corridor is referenced as a new strategic intervention. One option for this is a new road connection running from A644 at Low Mill Lane, crossing the river Calder and railway line, then connecting with and running through the site and onwards to Dewsbury town centre via Forge Lane and Savile Road. This scheme is known as the Dewsbury Riverside Strategic Route (DRSR)

- 2.17. Given the likely delivery rates for the development, the strategic intervention required at circa 2,000 units will be needed towards the end of the plan period in 13 to 14 years.
- 2.18. Miller Homes commissioned Arup to carry out a review into the engineering feasibility of a potential new bridge which would form a key part of the DRSR. The new bridge would span the River Calder and the railway line. The Arups feasibility review concluded that the proposed structure is deliverable.
- 2.19. **These investigations have shown that the road can be delivered, that it reduces congestion along the A644 and have benefits in terms of journey time savings.**
- 2.20. This highway scheme is an option for creating additional capacity on the network and resolving traffic congestion issues in the area. As a highway option for Dewsbury the highway scheme should therefore be identified in the Plan.
- 2.21. The route of the strategic highway through Dewsbury Riverside should therefore be denoted on the Proposals Map and listed in Site TS5 as part of the scheme detail. The Plan attached at **Appendix I** and shown below identifies the route to be identified.



- d) **Is the approach of seeking infrastructure delivery alongside development, as established in Policy PLP 4, justified and effective? What effect will this have on the phasing of development proposals?**

2.22. Miller Homes has no specific comment in relation to this issue.


- d) **Is there evidence that the scale of developer contributions, policy burdens and CIL rates will not render development unviable?**

2.23. Miller Homes has no specific comment in relation to this issue.

Proposed Change

2.24. To overcome the objection and address soundness matters, the following changes are proposed:

- Refer to the strategic highway through Dewsbury Riverside in the Infrastructure Delivery Plan and on the Proposals Map.
- Refer to the strategic highway through Dewsbury Riverside within the scheme detail of TS5.



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Proposed Highway Corridors
Drawing Title: Devonport/Riverside
Drawing No.: 0001/0015
Drawing Date: June 2016
Drawing Scale: NTS
Drawn By: AR
Checked By: CM
Project No.: 3365
Project Title: Devonport/Riverside
Client Name: Miller Homes
Address: 41 Business Centre, Thorpe Road, East Kirby, Leeds, West Yorkshire, LS12 7AB
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Revisions