

Kirklees Local Plan Examination

Statement in relation to Matter 2

Spatial development strategy

Prepared by Nexus Planning on behalf of Ms Margaret Dugdill and Mr Brian Dugdill

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Issue – Does the overall growth and spatial strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?

Policies PLP 2, 3

a) Are the boundaries of the sub-areas, as established in the Place Shaping chapter, appropriately defined?

- 1.1 Nexus Planning do not agree with the boundaries of the sub-areas as set out in the Place Shaping Chapter.
- 1.2 There needs to be a clear distinction made between individual settlements and a top-down hierarchy established that acknowledges the relative sustainability of each settlement. The Technical Paper ‘Spatial Development Strategy and Development Appraisal’ (Doc Ref: BP17) does make a clear distinction between individual settlements and so this should be translated into the Place Shaping Chapter.
- 1.3 We are not suggesting that each individual settlement is identified. It is clear that Huddersfield (population 139,263) is by far the largest individual settlement and its identification as a single sub-area is appropriate and can be justified. Beyond this, the next largest settlements are Dewsbury (44,157) and Batley (34,317), followed by Heckmondwicke (23,940), Mirfield (18,075) and Cleckheaton (16,110). Beyond these large settlements, there is a significant drop in population to the next largest (Honley/Brockholes – 7,362) and the remainder of the borough is then made up of a number of small rural settlements.
- 1.4 By not making a clear distinction between the six largest settlements, which naturally act as hubs for shopping, employment and leisure needs to serve a much wider area, there is a danger that the distribution of development will not reflect the status of these settlements in particular. Our detailed concerns in this regard are set out in response to question e) below.

b) Does the Plan's Vision and Place Shaping Chapter provide a clear framework for the future growth and development of different sub-areas of the borough?

- 1.5 Nexus Planning support the Plan's Vision, but this has not then been carried through explicitly enough into the remainder of the Place Shaping Chapter or to other policies contained within the Plan. The primary concern in this regard relates to housing delivery, specifically in Mirfield.
- 1.6 Related to our response to question a), the Place Shaping policy for Dewsbury and Mirfield does not address the challenges and opportunities that face each settlement. Our view is that a specific minimum housing requirement should be established for Mirfield from the outset as this is a fundamental factor that will influence the delivery of key infrastructure and will ensure that existing services and facilities continue to be supported, to the benefit of all residents.

c) The Plan seeks to fully meet the objectively assessed employment and housing needs for the district, and proposes an urban focus with some releases of land from the Green Belt. What alternative strategies were appraised, and why were they discounted?

- 1.7 Nexus Planning has no specific comments to make at this stage.

d) Paragraph 2 of the spatial development strategy (page 36 in the Plan) seeks to focus 'most growth' in the main urban areas of Huddersfield and Dewsbury. Is this strategy and distribution clearly defined, justified and sustainable? To what extent will it be achieved?

- 1.8 Nexus Planning agree that Huddersfield in particular should be the primary focus for growth in the borough. Proportionally, Dewsbury, as a result of its size should also receive a greater share of the housing distribution when compared to other settlements. However, we have concerns regarding the skewed distribution that seems to have occurred in respect of Mirfield by virtue of it falling within the same sub-area as Dewsbury as defined in the Place Shaping Chapter.
- 1.9 As set out in Table 1 later in this Statement (see response to question e)), the 5,000 dwellings required to be delivered in Dewsbury equates to a 27% increase above the existing number of dwellings, yet by comparison Mirfield has a housing distribution of just 400, or a 5% increase. The latest Strategic Housing Market Assessment (2016; Doc Ref: SD 18) also considered the

sub-area of Dewsbury and Mirfield combined and by disproportionately distributing the vast majority of development towards Dewsbury in order to meet identified needs within the sub-area, this fails to address housing needs in Mirfield, particularly the need for additional affordable housing.

- 1.10 The Local Plan and evidence base does indeed make a distinction between the two settlements. It recognises that each settlement is independently served by its own range of shops, services and sources of employment, which to a large degree serve the residents of each town. There is also a recognition that Mirfield, independent from Dewsbury, has a strong housing market in its own right. On this basis, there is no justification whatsoever to re-direct the vast majority of housing growth within the sub-area towards Dewsbury at the expense of Mirfield.
- 1.11 Nexus Planning are of the view that as currently drafted, the spatial development strategy is flawed and needs to be rebalanced in respect of the distribution of housing towards Mirfield.

e) What is the Council’s spatial development strategy for other parts of Kirklees? Is the strategy and distribution of growth clearly defined in the Plan and justified? How have place-making principles (an area’s character, constraints and opportunities) been balanced against settlement sustainability?

- 1.12 Nexus Planning have fundamental concerns with regards to the scale and distribution of development identified in Mirfield in particular and believe that the approach that has been taken is inconsistent with that applied elsewhere in the borough. The inclusion of Mirfield within the ‘Dewsbury and Mirfield’ sub area seems to have had the effect of skewing housing distribution away from Mirfield in favour of Dewsbury. This approach is fundamentally flawed as it completely contradicts the Council’s own evidence base, in particular the findings of the Spatial Development Strategy and Settlement Appraisal Technical Paper (Doc Ref: BP 17).
- 1.13 Although not explicitly referred to within the Local plan itself, Appendix 2 (Table 13) of the Housing Technical Paper confirms that just that 402 new homes are to be accommodated in Mirfield over the plan period. As the fifth largest settlement in the borough with a significant level of shops, services, employment and leisure opportunities and public transport links readily available, the level of distribution apportioned to Mirfield seems drastically disproportionate when considered alongside other settlements.

1.14 The following table sets out the level of housing distribution specified in the Housing Technical Paper, along with the population of the settlement and the percentage level of growth the settlement is to accommodate:

Table 1: Percentage increase in households upon application of the intended Housing Distribution

Settlement	Population	Existing dwellings*	Housing by settlement**	% Increase
Huddersfield	139,263	57,310	6,861	12
Dewsbury	44,157	18,172	4,952	27
Batley	34,317	14,122	725	5
Heckmondwike	23,940	9,852	306	3
Mirfield	18,075	7,438	402	5
Cleckheaton	16,110	6,630	1,291	19
Honley/Brockholes	7,362	3,030	343	11
Lepton	3,902	1,606	819	51
Netherton	3,437	1,414	410	29
Skelmanthorpe	4,407	1,814	402	22
Clayton West/Scissett	4,118	1,695	402	24
Linthwaite	3,572	1,470	354	24
Meltham	3,719	1,530	327	21

*Assumes avg 2.43 persons per household in Kirklees as per 2011 Census data

**As set out in Appendix 2 of the Housing Technical Paper April 2017 (Doc Ref: SD 23)

1.15 As the table illustrates, proportionally Mirfield is to accommodate a vastly disproportionate amount of the overall housing growth when compared to the majority of other key settlements in the borough, despite being the fifth largest settlement and a highly suitable location to accommodate additional housing. This distribution of growth is contrary to the Framework, which promotes sustainable patterns of growth and the proposed 5% increase in housing numbers will do little to foster economic growth in the town, completely ignoring the

link that exists between the provision of new housing, employment opportunities and maintaining the provision of key services and facilities.

- 1.16 Crucially, there are inconsistencies in the evidence base prepared by Kirklees and there is no logical explanation as to why Mirfield has been distributed just 402 dwellings.
- 1.17 The Spatial Development Strategy and Settlement Appraisal Technical paper is the primary evidence base document that attempts to justify the intended housing distribution. For ease of reference, the following are the pertinent comments made in respect of Mirfield:
- Para 3.3 – It is suggested that the green belt review indicates that it would be difficult to accommodate significant growth to certain settlements, including Mirfield and Holmfirth.
 - Para 3.6 – Expanding upon paragraph 3.3, it is stated that it is specifically the southern fringes of Mirfield that act constraint to any significant green belt release.
 - Figure 5 – acknowledges that Mirfield is currently the districts only direct rail link to London and that there are good links to the M62.
 - Figure 5 – The strong housing market areas of Mirfield and the outskirts of Dewsbury represent an opportunity for growth.
 - Figure 5 – The district centre at Mirfield meets a range of everyday shopping and service needs, along with other local centres throughout the town.
 - Figure 5 - The railway station at Mirfield has a lack of facilities.
 - Figure 5 - Narrow green belt gaps separating some settlements, particularly around Mirfield act as a constraint to growth.
 - Para 13.4 - The majority of Mirfield is residential, with a large amount of housing developed in the 20th century.
 - Para 13.23 – It is confirmed that the Local Plan allocates smaller housing sites across Dewsbury and Mirfield. The settlements in this sub-area are acknowledged to generally have high levels of accessibility, so the Local Plan seeks to focus housing in this location, particularly in Dewsbury. At this point no reason is given as to why the distribution in this sub area is skewed so heavily towards Dewsbury.
 - Para 13.33 - The Green Belt around Mirfield is narrow between Mirfield, Northorpe and Ravensthorpe, between Lower Hopton and Upper Hopton and between the northernmost tip of the settlement and Roberttown.
- 1.18 Having undertaken a thorough review of the Settlement Appraisal Technical Paper it clearly points towards the highly sustainable nature of the town of Mirfield, highlights its excellent

public transport connections, wide range of shopping, employment, service and leisure provision and strong housing market. Combined with the size of the existing settlement and the fact that it is the fifth largest in the borough, these factors clearly point towards Mirfield justifiably being distributed a greater proportion of housing growth when compared to other settlements.

- 1.19 The only reason that seems to present itself (but not in any specific level of detail) is the constraints that are claimed to have been identified in the green belt review that supposedly limit the amount of green belt land that could be considered suitable for release.
- 1.20 We have also undertaken a thorough assessment of the Green Belt Review (Doc Ref: SD 19) and the accompanying Green Belt Edge Map for Dewsbury and Mirfield (Doc Ref: SD 20) and there is nothing presented within these evidence base documents that supports the view that the development potential of Mirfield should be constrained. Large sections of the perimeter of Mirfield satisfied the Stage 1 and Stage 2a assessment and of these, the majority had a final score of 3. A score of 1 is where development would be considered to represent a negligible impact upon the green belt and a score of 5 would lead to a significant impact. It is therefore borne out in the Council's submitted evidence that opportunities to release green belt around sections of the perimeter of Mirfield clearly exist, particularly to the north east of the settlement.
- 1.21 A more detailed assessment of the Green Belt Review findings is provided in our written response to Matter 8, but the overview of the evidence base findings provided here clearly points towards Mirfield not being constrained to the extent that housing distribution should be fettered in any way.
- 1.22 Further, there is a lack of evidence relating to physical constraints for development around Mirfield to the extent that the housing distribution figure should be suppressed. Having reviewed the Environmental Designations Technical Paper (Doc Ref: BP10), it is clear that Green Belt is the only potential constraint to future development around the vast majority of Mirfield (which is a planning policy matter) as it is not surrounded by biological, geological or other statutory designations that would preclude development taking place.
- 1.23 Assessing the evidence outlined above, it is clear that Mirfield should be a focus for growth and that the figure of 402 new homes over the plan period will simply not meet the future housing needs of Mirfield (especially affordable housing) and when considered in the context of growth across the borough as a whole, this approach is completely at odds with the principle of sustainable growth set out in the Framework.

1.24 Additional housing growth needs to be accommodated in Mirfield and Nexus Planning suggest that a figure of around 1,100 – 1,500 dwellings (or a 15-20% increase on the existing population) is more appropriate on a proportionate basis when considered against other settlements in the borough. The evidence base clearly supports this as an appropriate housing figure and so as a result this version of the Local Plan **cannot be considered to be sound in accordance with paragraph 182 of the Framework** as the plan is not:

- Positively prepared – as it will not meet full objectively assessed needs for market and affordable housing needs as a result of the flawed housing distribution, specifically in respect of Mirfield; or
- Justified – as it is not based upon the most appropriate strategy when considered against the reasonable alternatives and departs from the clear conclusions reached in the evidence base; or
- Consistent with national policy – as the intended housing distribution does not represent the most sustainable pattern of growth as advocated in the core planning principles set out in paragraph 17 and the absence of a policy with a clear settlement hierarchy and associated housing distribution fails to provide a sound basis for decision making.

f) Is the proposed allocation of land at Storthes Hall justified and consistent with the Council’s spatial development strategy?

1.25 Nexus Planning has no specific comments to make in response to this question.

g) Does the spatial development strategy in the Plan provide a clear framework in respect of retail and office development?

1.26 Nexus Planning has no specific comments to make in response to this question.

h) Should the Council’s spatial development strategy, as set out on pages 36 and 37 of the Plan, be expressed as a policy?

1.27 Yes, however any such wording will need to address the concerns outlined elsewhere in this Statement, specifically the requirement to establish a clear and logical settlement hierarchy

and associated housing distribution requirement. It would appear logical for this to be introduced into Policy PLP 3.

i) Does Policy PLP 3 provide a clear framework on locational requirements, in line with paragraph 154 in the NPPF? Does the policy give sufficient recognition to the protection of the Green Belt and the countryside? How will the development of brownfield sites be realised early in the Plan, as set out in criterion 2c?

1.28 A number of the criteria set out under Policy PLP 3 are ambiguous and vague and in line with our previous comments, a clear settlement hierarchy should be set out under this policy that goes beyond the sub-areas identified within the Place Shaping chapter.

j) What effect will the Plan's growth and spatial development strategy have on air quality and carbon emissions?

1.29 Nexus Planning has no specific comments to make in response to this question.