

Kirklees Local Plan Examination Hearing Statement

Our ref 50579/JG/AJk
Date September 2017

Subject Matter 2 Hearing Statement on behalf of Persimmon Homes West Yorkshire - Spatial Development Strategy

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of Persimmon Homes West Yorkshire and responds to the questions set by the Inspector in relation to Matter 2.
- 1.2 This Hearing Statement should be read in conjunction with our representations submitted during the Local Plan Consultation (2016) on behalf of Persimmon Homes (Lichfields representor ID: 969464, Persimmon representor ID: 975291).

2.0 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?

Question (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?

- 2.1 With reference to Persimmon Homes' Matter 3 Statement, it is clear that the Council does not propose to fully meet the objectively assessed housing need of the district.
- 2.2 The proposed strategy to focus growth on the main urban centres with some Green Belt land release is generally supported by Persimmon Homes, but the extent to which the Plan secures this strategy is unclear. This is because there is little clarity on how the balance of housing between these locations is settled. In particular, the role of the Green Belt review in determining suitable Green Belt land releases is questioned as this allows for the release of some large scale urban extensions, where more suitable Green Belt releases could be made elsewhere and which, as is the example of land at Kirkburton (H575), would fit within an overall urban focussed growth strategy, but result from a more considered and spatial strategy-compliant site assessment process.

Question (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?

- 2.3 As this question contains several sub-questions relating to the Plan's proposed spatial development strategy, we have structured this Hearing Statement in a way which clearly deals with each sub-question.

Is the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury clearly defined?

- 2.4 It is considered that the intention to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury is not clearly defined, as there is no definition of what the ‘main urban area’ is, or what constitutes ‘most growth’. Without these clarifications, it will not be possible to ascertain whether the strategy is achievable, or measure its success.

Is the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury justified?

- 2.5 In principle, it is considered that the strategy to focus growth in the main urban areas of Huddersfield and Dewsbury is justifiable to some extent. However, we would question the evidence base which has informed the spatial development strategy, and would comment that suitable sites which are at other smaller settlements should not be excluded on the basis of this strategy, which, as referred to above, is not clearly defined.
- 2.6 The Spatial Development Strategy and Settlement Appraisal background paper (BP17) states that one of the main place shaping/environmental considerations which has helped determine the spatial development strategy is the Green Belt Review. As set out in our separate Hearing Statement on Matter 8, it is considered that the Green Belt Review is flawed, and on that basis it is likely that opportunities for housing growth in other settlements (i.e. not Huddersfield or Dewsbury) have been dismissed inappropriately. One such example is site H575 at Kirkburton, where the Council concluded the following in the Green Belt Review (BP25) and Rejected Site Options Report (LE4.1):

This is a large site which is contained to the west and south by the existing settlement and to the north and east by potential strong new green belt boundaries formed by Paddock Road and Moor Lane. As such there should be no risk of sprawl... The existing land use pattern and settlement form presents some opportunity for rounding off without compromising the role of the green belt in this location’

- 2.7 Revisiting some of the sites which have been rejected in the Green Belt Review could allow for a more balanced approach to be put forward in the Plan which still allocates the majority of development in Huddersfield and Dewsbury, but also identifies appropriate requirements in other settlements. This may ultimately result in the amount of development proposed in Huddersfield and Dewsbury reducing, to be replaced by more appropriate sites in other settlements which at present do not have enough homes allocated for their size and infrastructure.

Is the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury sustainable?

- 2.8 A strategy which focusses most growth in existing main urban areas is sustainable, but, as raised above, there is an over-dependency on Huddersfield and Dewsbury which will potentially result in the full OAHS not being delivered. It is considered that sustainably located sites on the edge of other smaller (but well serviced) settlements have been dismissed due to errors in the Green Belt Review.
- 2.9 The Plan, as currently drafted, seeks to provide large numbers of homes on the edge of Huddersfield and Dewsbury through large scale Green Belt release in order to meet the aim of

having most growth in these settlements, even though these sites are not within the ‘main urban areas’. This is evidenced beneath Table 1 on page 37 of the Plan which attempts to clarify that:

‘For the purposes of assessing the distribution of housing the strategic sites at south Dewsbury and Chidswell are considered to be part of Dewsbury’

- 2.10 Therefore, whilst a strategy to focus growth in existing main urban areas, including but not limited to Huddersfield and Dewsbury, is sustainable, this is not what the Plan is currently promoting. As a prime example, the Plan is proposing to allocate land to the south of Dewsbury within the Green Belt while ignoring the development option at site H357 (Rumble Road, Dewsbury) which is contained within the urban area, and which the previous UDP Inspector concluded should be allocated for housing development.
- 2.11 It is considered that the proposed allocation of very large sites on the edge of Huddersfield and Dewsbury will not make optimum use of the urban capacity of key settlements, and is not the most sustainable approach in light of other development options.
- To what extent will the aim to focus ‘must growth’ in the main urban areas of Huddersfield and Dewsbury be achieved?**
- 2.12 This aim will not be substantially achieved with the housing and mixed use allocations currently proposed.
- 2.13 Much of the housing proposed through the site allocations is not within the urban areas of Huddersfield and Dewsbury, but is contained within three larger sites at the edge of these settlements, removed from town centres and existing infrastructure provision (sites H2089, MX1905 and H1747). Sustainable and deliverable sites within urban areas, and smaller non-strategic edge of settlement sites which have good access to local services, have performed well in the Green Belt Review but have been dismissed. Site H575 in Kirkburton is an example of a site which is sustainably located and performed well in the Green Belt Review, and could serve localised housing needs in a smaller settlement (Kirkburton). A more blatant example of where the Plan misses an opportunity to meet this aim is site H357 at Rumble Road in Dewsbury, which is in the control of Persimmon Homes, has been found by officers at Kirklees to be technically unimpeded and sustainably located, and was recommended for allocation by the previous UDP inspector but was ultimately dismissed by Members during the UDP examination.
- 2.14 Notwithstanding the detached location of the three large strategic housing and mixed use sites put forward in the Plan and whether these will meet the aim of focussing growth in the ‘main urban area’, there are serious reservations regarding the deliverability of these sites in general. These reservations are discussed in detail in our Hearing Statement on Matter 4 (see specifically Table 1 at paragraph 2.6 of Persimmon’s Matter 4 Statement), but in summary it is considered that sites H2089, MX1905 and H1747 will not deliver the amount of housing stated in the Plan, primarily as a result of site specific constraints and unrealistic assumed lead-in times and delivery rates. The shortfall of housing which will occur from the failure to deliver these sites in full makes it impossible to predict whether the spatial development strategy will be achieved, unless more sites are identified to make up for this shortfall.
- 2.15 The above concern relating to the proposed strategic Green Belt site releases is not only a matter of concern relating to the deliverability of the larger sites within the Plan period, but also to the likely failure of the Plan to secure a short term housing delivery that will meet immediate short term housing requirements and remedy an ‘acute and critical’ (References: APP/Z4718/W/16/3162164 – White Lee Road, Batley and APP/Z4718/W/16/3147937 – New

Lane, Cleckheaton) shortfall in the Council's five-year housing land supply. This will result in a Plan that fails to deliver a positively framed spatial strategy. This will result in a very real problem for people in Kirklees seeking access to a home over the short and medium terms, where the housing crisis already pervades due to a delivery failure. The Plan must secure a balance of smaller, short-term housing sites and larger strategic sites to ensure that national policy to resolve the housing crisis is positively addressed.