

Kirklees Local Plan Examination Hearing Statement

Our ref 50511/JG/AJk
Date September 2017

Subject **Matter 2 Hearing Statement on behalf of KeyLand Developments Ltd
– Spatial Development Strategy**

1.0 Introduction

- 1.1 This Hearing Statement has been prepared by Lichfields on behalf of KeyLand Developments Ltd and responds to the questions set by the Inspector in relation to Matter 2.
- 1.2 This Statement should be read in conjunction with our representations submitted during the Local Plan Consultation (2016) on behalf of KeyLand (representor ID: 969464). KeyLand Developments is the property trading business of the Kelda Group and a sister company of Yorkshire Water. It has control over site H596 and has promoted the site for housing development.

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 (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?

- 2.1 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?

- 2.2 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?

- 2.3 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.

- 2.4 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 large settlements have been dismissed inappropriately. These opportunities, such as site H596, would have enabled the Council to meet its aim of bringing forward most new housing development closer to the main strategic employment locations identified along the M62 corridor (as stated in paragraph 3.9 of background paper BP17).
- 2.5 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?

- 2.6 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 OAHN 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.
- 2.7 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’*
- 2.8 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. 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?

- 2.9 This aim will not be substantially achieved with the housing and mixed use allocations currently proposed.
- 2.10 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 H596 is a prime example of a site which could be developed quickly within the plan period with little or no harm to the wider Green Belt, and has good proximity and access to town centres (Cleckheaton and Liversedge) and the M62 corridor.

- 2.11 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, 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.