

Hearing Statement – Matter 6

Kirklees Local Plan

On behalf of Miller Homes

August 2017



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Miller Homes in respect of:
- Matter 6: Employment needs and delivery
- I.2. Miller Homes has significant land interests in the area and has made representations to earlier stages of the Local Plan process.
- I.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.
- I.4. Miller Homes has also expressed a desire to attend and participate in Matter 6 of the Examination in Public.

2. Matter 5 – Employment needs and delivery

Issue - Does the Plan set out a positively prepared strategy for the delivery of employment development and jobs, which is justified, effective and consistent with national policy?

- i) Is the Council's PEA study based on a comprehensive and robust assessment of site suitability for employment across Kirklees, which takes into account the needs of different sectors and the intentions of landowners/businesses? How much land was identified in the process as being unsuitable for PEA designation? How many of these sites are proposed for allocation for other uses in the Local Plan?**
- k) Is the approach to protecting PEAs from loss to non-employment use, as set out in section 2 of Policy PLP 8, clearly defined, justified and consistent with national policy? What evidence will be required from applicants, in order to demonstrate that sites or premises are no longer capable of employment use?**

2.1. Miller Homes is concerned that the approach towards identifying and safeguarding Priority Employment Areas lacks evidence and is inconsistent with the aims and objectives of the Plan towards regenerating and rejuvenating Dewsbury and Ravensthorpe and its riverside areas.

2.2. The Dewsbury Riverside project forms an essential element of the regeneration plans for Dewsbury. The vision for Dewsbury Riverside is to deliver transformational change and investment and create a high quality gateway. The key element being to drive forward the economy in the region, enhance the residential offer, regenerate the Town Centre, improve the environment, create excellent transport connectivity and improved access to employment opportunities. The redevelopment of the area will accelerate the urban renaissance of Dewsbury and enhance the connectivity between the existing communities and the environment beyond. This will create the potential for new active leisure opportunities within Dewsbury, promoting healthy living and an improved environment. The renewal of Dewsbury would help the town to achieve its economic growth aspirations over

the coming decades. Consequently, it would enhance the effectiveness of previous and ongoing investment to revitalise Dewsbury Town Centre, as well as providing the opportunity to help support and enable housing growth.

- 2.3. However, the Proposals Map shows the designation of a vast swathe of Priority Employment Areas where strategic inward investment will be secured to deliver a potential new strategic highway, uplift the area, open up the river frontage and seek to create attractive neighbourhoods, riverside walkways and economic growth along with the strategic delivery of a residential-led urban extension to the south of the river (H2089). **The concept of retaining and safeguarding all this land as Priority Employment Area is incompatible with such a Vision and as such the Plan is unsound.**
- 2.4. Miller Homes supports the concept of employment retained within this area; however there must be flexibility to the policy. At present the policy, seeks to retain some pretty poor quality employment land in perpetuity, including scrap yards and polluting uses. The only way the employment land can be considered for alternative uses is if it can be proven that it is not needed **and** the proposed use is compatible with adjacent uses, which conflicts with the aims and ambitions for the area which is to elevate the area and enhance the waterfront.
- 2.5. Miller Homes considers that the areas of Dewsbury and Ravensthorpe which the Council are supporting as part of the regeneration ambitions and economic growth for the area should be covered by a more flexible and positive policy towards supporting schemes and alternative uses which reflect the aims and objectives of the Vision for Dewsbury.
- 2.6. The current approach does not appear to be joined up. Miller Homes are particularly concerned that the justification in the updated Priority Employment Technical Paper (October 2016) is not robust and does not explain the decision making process. The Technical Paper shows site scorings and sites were graded Green, Amber or Red. Irrespective of the site's grading sites were then designated Primary Employment Areas. For Example D&M11 and D&M12 in Dewsbury which are on the entrance corridor into Dewsbury Riverside were graded Amber, however, these sites were still considered locally important without any justification. **Therefore, the evidence base is not available, open and transparent regarding the designation of the employment sites and as such the approach of the Plan is unjustified and unsound.**

- 2.7. The Employment Technical Paper (SD22) Paragraph 2.44 appears to justify Primary Employment Areas solely on Paragraph 157 bullet 6 of the Framework, which states:
- 2.8. *Identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation.*
- 2.9. In pursuing the designation of Primary Employment Areas in Dewsbury the Council has misconstrued and misunderstood the Framework, which states such designations should only be established “where necessary” and “with a clear explanation” plus also such areas in Dewsbury do not accord with bullet 1 of Paragraph 157 that Local Plans should:
- 2.10. *Plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework.*
- 2.11. Miller Homes consider that the Priority Employment Areas along the River Calder in Dewsbury and Ravensthorpe should be re-designated to accord with the aims and objectives of the Plan and the Vision for the area and allow for the potential for mixed-uses, including housing, café’s, retail to create vibrancy and an attractive river frontage and inject investment and economic growth to the area. The Priority Employment Areas, which should be re-designated, are:
- D&M11
 - D&M12
- 2.12. Miller Homes have particular concerns with D&M11 and D&M12 which are on the entrance to the Dewsbury Riverside urban extension and are likely to be needed for a potential new strategic highway.

Proposed Change

- 2.13. To overcome the objection and address soundness matters, the Local Plan should be amended as follows:
- Review the approach to towards safeguarding employment sites in Dewsbury and Ravensthorpe

- Remove the allocation of D&M11 and D&M12 as Priority Employment Areas and replace with a positive allocation encouraging regeneration and alternative uses in accordance with the Vision for Dewsbury.