

Hearing Statement – Matter 8

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 8: Approach to site allocations and Green Belt release

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 8 of the Examination in Public.

2. Matter 8 – Approach to site allocations and Green Belt release

Issue – Is the Plan’s approach to identifying site allocations (housing, employment and mixed use), safeguarded land and Green Belt releases soundly based and in line with national policy?

a) Has the Council undertaken a robust and comprehensive assessment of development capacity within existing urban areas and other areas outside the current Green Belt?

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

b) Do exceptional circumstances exist which justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional land for employment uses?

2.2. Miller Homes considers that due to the significant need and demand for housing and aspirations for economic and housing growth there is clearly a requirement for a strategic review of the approach to locations for future growth within the district. In order to plan appropriately for the plan period there is a need to review the Green Belt boundaries.

2.3. There is a significant level of housing need in Kirklees and Dewsbury in particular. The area is identified for Housing Market Renewal, with the aim being to improve the choice of housing, including aspirational forms of housing which will satisfy local need as well as helping to attract different socio economic groups to the areas, thus reflecting a diversity of household needs and aspirations.

2.4. The Housing Market Renewal funding documents identify the area as suffering from severe social stress issues and displaying evidence of Market Failure. Demand for all types of property is high, with the majority of demand coming from within the area. There is growing evidence of overcrowding and a need for larger family housing and a significant level

of suppressed demand, that is, concealed households in larger groupings, who might wish to form their own households if viable financially and locally.

- 2.5. The National Planning Policy Framework (the Framework) states that local authorities should meet their objectively assessed housing needs in full. Furthermore, the Framework's core planning principles in paragraph 17 states that planning should "proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth". This is reflected in the Housing White Paper: Fixing our Broken Housing Market (2017) which states that "local planning authorities have a responsibility to do all they can to meet their housing requirements".
- 2.6. In relation to the housing need in Kirklees the Edge Analytics report "Kirklees Demographic Analysis and Forecasts" shows that in relation to the scenarios that the Council's economic growth aspirations will require significant housing growth. The Publication Draft Local Plan (November 2016) proposes 1,730 dwellings per annum and 31,140 dwellings over the Plan period up to 2031. The Council recognise to achieve this level of housing growth that some Green Belt land will need to be released for new housing land.
- 2.7. The opportunity to revitalise Dewsbury and utilise an urban extension to the south to transform and reinvigorate the area will deliver significant regeneration benefits alongside housing growth. Dewsbury Riverside is in keeping with the strategic aspirations for the area. This site includes a current UDP housing allocation and safeguarded site and Green Belt land, which can provide a significant number of dwellings, and therefore can assist in the strategic aims for transforming the area.

c) What approximate proportion of land in Kirklees which would remain in the Green Belt following the implementation of proposals in the Local Plan?

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

- d) Is the Council’s approach to assessing potential sites in the Green Belt for development soundly based and in line with national guidance?**
- i. Is the approach in the Green Belt Review, based on the assessment of Green Belt edge sites, robust and justified?**
 - ii. As part of the overall site allocations methodology, is there clear evidence to show that site options not captured or full appraised in the Green Belt Review have subsequently been fully assessed against relevant Green Belt purposes?**
 - iii. Is the ‘gateway’ approach in the Green Belt Review justified? (whereby failure to meet Test 1 meant Test 2 on Green Belt purposes was not engaged, and failure to meet Test 2a meant no further assessment against other Green Belt purposes)**
 - iv. Are the other assessment tests in the Green Belt Review justified and soundly based? To what degree are the identified topographical, physical and environmental constraints absolute, and were site-specific solutions or partial development options taken into account? Is test 2d consistent with Green Belt purposes as defined in the NPPF and as they relate to Kirklees?**
 - v. To what extent has the process of assessing Green Belt sites taken account of the extent of remaining gaps between different settlements and the maintenance of separate settlement identity, and emerging proposals in neighbouring authorities that would reduce these gaps?**
 - vi. Is it clear how site development options were identified?**
 - vii. How have sustainable development requirements and the need to promote sustainable patterns of development been taken into account in decisions on site options, in accordance with paragraphs 84 and 85 in the NPPF? Are there specific examples of sites which scored well in the technical appraisal and Green Belt Review but were rejected for reasons linked to**

the sustainability of a settlement?

viii. Have all sites which scored well in the site assessment process for housing been allocated for this purpose?

- 2.9. Kirklees Council have recognised that in order to deliver 31,140 new homes by 2031. Green Belt land will need to be released for development. Release of the Dewsbury Riverside site will not however result in the merging of any existing settlements or in any advance impact on the setting and character of an historic town. It will however create a new, long term defensible Green Belt boundary to the south of the site and catalyse local regeneration.
- 2.10. Kirklees is enveloped by the West Yorkshire Green Belt which is placing a significant pressure and obstacle to housing delivery. To meet the housing need and economic growth aspirations Kirklees will need to review the Green Belt. Dewsbury Riverside is a unique opportunity to meet the housing need and economic growth aspirations whilst delivering significant regeneration benefits for the area.
- 2.11. Paragraph 83 of The Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide housing in Kirklees, and the need for regeneration and renewal in Dewsbury and Ravensthorpe. The aspirations to revitalise the area, which stem from the Housing Market Renewal programme, North Kirklees Strategic Development Framework and the now revoked Regional Spatial Strategy provide the context for Green Belt change, inward investment and urban renaissance.
- 2.12. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will not result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town.
- 2.13. Miller Homes consider the proposed new Green Belt boundary at Dewsbury Riverside is robust and has been designed to accord with the Framework which requires that boundaries should be clearly defined using readily recognisable features to ensure permanency. The

proposed edge of the Green Belt that would be created by Dewsbury Riverside would utilise distinctive features and have a positive role to play in distinguishing between the urban and Green Belt areas. The proposed new boundary would be amended to utilise existing woodland, field boundaries, tree belts, lanes and tracks to ensure the Green Belt is defined for the long term. The development of the site would lead to opportunities being created for green infrastructure and access to the green spaces beyond. The site would be within close proximity to both opportunities for outdoor sport and recreation and service and retail facilities and employment opportunities. The boundary therefore fully accords with the Framework and is well defined for the long term.

e) Is the Council's approach to other proposed changes to the Green Belt boundaries, including those arising from the digitising exercise, small site assessment, consequential changes and proposed additions, justified and robustly based? Have exceptional circumstances been broadly demonstrated?

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

f) The Plan identifies a number of safeguarded sites on land not currently within the Green Belt. Is this approach justified and in line with national policy and guidance?

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

g) What evidence is there to demonstrate that safeguarded sites which have been assessed as unsuitable or undeliverable for housing development over the Plan period will be capable of delivery for this use in the longer term?

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