

**Written Statement – Matter 11**

# **Kirklees Local Plan**

On behalf of Miller Homes

October 2017



## I. Introduction

- I.1. This is a Written Statement prepared by Spawforths on behalf of Miller Homes in respect of:
- Matter 11: Minerals Allocations
- 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. This is a Written Statement and Miller Homes will not be attending the Examination in Public on this matter.

## 2. Matter 11 – Minerals Allocations

**Issue – Whether the provision in the Plan for allocated minerals sites is justified, effective and consistent with national policy and the policies of the Plan**

**d) Is the allocation of the following minerals infrastructure safeguarding sites in the plan justified, effective and consistent with national policy. Explain how the safeguarding of the relevant infrastructure can be integrated into plans to regenerate Dewsbury/ Ravensthorpe. Explain how the safeguarding of site MI3403 can be reconciled with the needs of Network Rail**

- 2.1. Miller Homes is concerned that the approach towards identifying and safeguarding Minerals Infrastructure Sites 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. Miller Homes **maintains its objection** from earlier versions of the Local Plan and is particularly concerned with the approach in Dewsbury, which does not appear to embrace the vision for the area. The Vision for Dewsbury Riverside is about largescale inward investment in Dewsbury and Ravensthorpe to deliver market intervention and a step change in market perception, deliver significant infrastructure, new housing and economic opportunity which will allow for the regeneration of Dewsbury Town Centre and traditional industrial estates potentially into alternative uses along the river frontage, create riverside walkways and redevelopment of former mills and brownfield sites.
- 2.3. The delivery of up to 4,000 new homes in an urban extension to the south of Dewsbury will be a driver for this regeneration. The overall scheme will create sufficient economic impetus to deliver new roads, rail and pedestrian and cycle infrastructure, regenerate Dewsbury Town Centre and Ravensthorpe. However, particular policies in the Plan do not embrace this approach by seeking to safeguard and protect all these sites as mineral infrastructure, employment or waste sites. If these sites are retained in existing uses then

the Vision for regenerating Dewsbury will be constrained as the step change in the market will be hindered by additional hurdles and an onerous and prescriptive policy approach.

**Miller Homes would suggest a more positive spatial policy encouraging regeneration and renewal would be more appropriate**

- 2.4. The Proposals Map shows the designation of large areas of Minerals Infrastructure adjacent to Dewsbury Riverside and in the heart of Dewsbury and Ravensthorpe where strategic inward investment will be secured to deliver a potential new strategic highway, 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 Minerals Infrastructure Sites in this area is incompatible with such a Vision and as such the Plan is unsound.**
- 2.5. Miller Homes understands the concept and need for Mineral Infrastructure Sites and that they are employment generators. However, there must be flexibility to the policy to allow for their re-use to encourage regeneration and renewal in the area. At present the policy, seeks to protect all facilities by restricting “development on or within 100m of protected minerals infrastructure sites” unless for example it can be demonstrated that the mineral use is no longer viable, the new development will provide a better mineral facility, or there is an overriding need for the development. This approach is onerous and restrictive but more importantly the policy places a restriction on neighbouring uses within 100m. Given the location of mineral infrastructure sites in Dewsbury and Ravensthorpe these could hinder the prospects of the Vision for Dewsbury and regeneration and renewal and catalytic effect the investment will have. The policy creates the wrong message for the regeneration ambitions for Dewsbury and Ravensthorpe.
- 2.6. 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.
- 2.7. The current approach does not appear to be joined up. Miller Homes consider that the mineral infrastructure sites 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 regeneration and economic growth to the area. The minerals infrastructure sites, which should be re-designated, are:

- MI3399 – Newlay Concrete, Calder Road, Ravensthorpe
- MI3404 – Longley C.R. & Co Ltd, Ravensthorpe Road
- I3398 – Lees Hall Road, Thornhill Lees, Dewsbury

## Proposed Change

2.8. To overcome the objection and address soundness matters, the following changes are proposed:

- Review the approach to towards protecting mineral infrastructure sites in Dewsbury and Ravensthorpe.
- Remove the allocation of MI3339, MI3404, and MI3398 as protected mineral infrastructure sites and replace with a positive allocation encouraging regeneration and alternative uses in accordance with the Vision for Dewsbury.