

**Written Statement – Matter 18**

# **Kirklees Local Plan**

On behalf of Miller Homes

November 2017



## I. Introduction

- I.1. This is a Written Statement prepared by Spawforths on behalf of Miller Homes in respect of:
- Matter 18: Retailing and Town Centre Policies
- 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 18 – Retailing and Town Centre Policies

**Issue – Does the Plan set out positively prepared policies for protecting and enhancing town centres and supporting retail growth, which are justified, effective and consistent with national policy?**

**b) Are the requirements relating to development proposals in out of centre locations, as set out in the bullet points in section B of Policy PLP 13, justified and in line with national policy and guidance?**

2.1. Part B of Policy PLP13 stipulates that all proposals shall demonstrate:

- the business model for the development and appropriate catchment that the business would seek to serve in accordance with the Shopping Centre Hierarchy Table shown above.
- an extensive audit trail of any sequentially preferable sites that have been discounted and robust justification given.
- any regeneration or economic benefits brought forward by the development.
- appropriate access/improvements to access by all travel modes, in particular by public transport, safe and convenient pedestrian and cycling routes, and provision of an appropriate level of vehicular and cycle parking; and
- connectivity to surrounding defined centres, and appropriate enhancements to these linkages.

2.2. This format and level of information is in excess of the approach established in the Framework through Paragraphs 24, 26 and 27. Paragraph 24 states with regards to sequential assessments that “applicants and local planning authorities should demonstrate

flexibility on issues such as format and scale”. Therefore, the content and context of reports is discussed on an individual site and bespoke basis when taking into account the nature of the scheme.

- 2.3. Such an approach is similar to an Impact Assessment whereby the Council state in Policy PLP13 that *“the scope and content of any Impact Assessment shall be agreed with the Council and shall be reflective of the scale, role and function of the proposal”*.
- 2.4. For consistency and to reflect the Framework, Miller Homes considers that the above approach should also relate to the sequential assessment.

### Proposed Change

- 2.5. To overcome the objection and address soundness matters, the following changes are proposed:
  - Remove the five bullet points in Policy PLP13 and replace with *the scope and content of any Sequential Assessment shall be agreed with the Council and shall be reflective of the scale, role and function of the proposal*.