



Kirklees Local Plan Examination Stage 1 – Initial Hearings

Matters, Issues and Questions (MIQs)

1.0 INTRODUCTION

- 1.1 This statement has been prepared by WYG on behalf of the Church Commissioners for England (herein referred to as “our client”) who have an interest at Leeds Road, Chidswell. By way of reference, our client’s land is referred to as *Land East of 932-1110 Leeds Road, Shawcross/Woodkirk, Dewsbury* (Draft Allocation Reference MX1905).
- 1.2 Our client’s site has been identified to deliver 1,535 dwellings, and 122,500sqm of employment development during the Plan period. They are therefore very keen to engage and assist in the preparation of a sound Local Plan which is positively prepared, justified, effective and consistent. This response seeks to address the key issues to be discussed at the forthcoming Kirklees Local Plan Examination Stage 1- Matter 2: Spatial Development Strategy.
- 1.3 The response is structured such that it follows the questions posed in the Matters and Issues agenda and should be read in conjunction with the representations by WYG on behalf of our client to the Publication Draft Local Plan in December 2016.

2.0 MATTER 2: SPATIAL DEVELOPMENT STRATEGY

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?

**Policies PLP 2, 3
Questions**

b) Does the Plan’s Vision and Place Shaping Chapter provide a clear framework for the future growth and development of different sub-areas of the borough?

- 2.1 **Yes.** The Vision for Kirklees is by 2031 it will be a great place to live, work and invest in. It recognises that to deliver this vision, development will have taken place in a sustainable way. This will be through balancing economic, social and environmental priorities, including encouraging inwards investment and stimulating economic growth. The Vision identifies our clients land as of strategic importance for the delivery of new employment opportunities.
- 2.2 The identification in the Vision reflects the reference in paragraph 1.30 of LPSP which refers to seven major development area proposals, including the *strategic employment growth opportunity at Chidswell* which has been identified in the Leeds City Region Strategic Economic Plan (SEP) have been identified in the Leeds City Region. These will combine easy motorway and public transport access with proximity to towns and labour markets including the Site.

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?

- 2.3 **Yes.** The overall Spatial Development Strategy (SDS) of the PDLP SP seeks to cut across several themes, including the spatial vision, strategic objectives and place shaping agenda to provide Kirklees a strategy.



- 2.4 Paragraph 2 of the SDS refers that following the appraisal of the capacity of existing settlements, the Council has assessed that “most growth” could be met in the main urban areas of Huddersfield and Dewsbury.
- 2.5 It is also clear that to meet the identified objectively assessed needs for the district in full land outside the main urban areas have been identified, including our clients’ land at Chidswell.
- 2.6 Paragraph 2 provides the overarching context for the SDS, whilst paragraph 3 examples the other factors that have fed into arriving at the strategy, including the role and function of the Green Belt, topography of the district, existing and planned levels of infrastructure.

Sustainable Economic Growth

- 2.7 The strategy for delivering sustainable economic growth is clearly defined in the SDD, which states that the Plan makes provision of about 165 hectares of new employment land to achieve a 75% employment rate over the Plan period. This objective is referred to in the Council’s supporting evidence including the Leeds City Region Strategic Economic Plan (LCR SEP) and Kirklees Economic Strategy, both of which are referred to at the bottom of page 37 of the PDLP SP.
- 2.8 By way of reference the LCR SEP sets out spatial priorities to maximise growth potential and ensure prosperity across the whole City Region and for Kirklees. Paragraph 1.30 of the LCR SEP sets out that the identified priorities for Kirklees include regenerating Huddersfield and North Kirklees and providing space for businesses to grow.
- 2.9 This includes strategic employment, mixed-use sites and Enterprise Zone sites. Paragraph 1.30 also refers to seven major development area proposals, including the *strategic employment growth opportunity at Chidswell* have been identified in the Leeds City Region. These will combine easy motorway and public transport access with proximity to towns and labour markets. This para is in part b too, is it required twice?

Sustainable Housing Growth

- 2.10 The SDD is clear in that it is planning to deliver no less than 31,140 dwellings between 2013 and 2031, which is an average of 1,730 dwellings per annum. The SDD refers to the net residual requirement, following the windfall allowance and other sources of potential supply, resulting in the need for the allocation of land to accommodate 21,234 new dwellings. This corresponds with Table 5 of the LPSP which is clear in how it has arrived at the residual requirement.

How will it be achieved?

- 2.11 The Plan is also clear that to deliver this part of the strategy will require a combination of:
- Development opportunities within the urban areas of Huddersfield and Dewsbury,
 - Allocated strategic sites in north Huddersfield, south Dewsbury and Chidswell;
 - Waste, minerals, travellers and safeguarded land; and
 - New retail, leisure, office, cultural and tourist facilities in the districts identified centres and on identified mixed use allocations.
- 2.12 Page 37 to 39 (inclusive) of the LPSP sets out how the vision, objectives and strategy will be delivered. In the context of Huddersfield and Dewsbury, the following are particularly relevant:



Support the growth and diversification of the economy

- *"Fully meet the objectively assessed employment needs for the district including the aspirations of the Leeds City Region Strategic Economic Plan and Kirklees Economic Strategy.*
- *Allocation of prime strategic employment locations along the M62 corridor.*
- *Local employment needs being met where demand exists in priority employment areas, employment and mixed use allocation in or on the edge of existing settlements.*
- *Focus on mixed use sites in the plan where land use mix can be more flexible, viable and allow for sustainable development and place shaping".*

Improve transport links and sustainable travel

- *"Focus on mixed use sites in the plan, where land use mix can be more flexible, viable and allow for more sustainable development and place shaping, particularly in or on the edge of town centre locations".*

Provide new homes which meet the housing needs of the community

- *"Fully meet the objectively identified market and affordable housing needs of the district in order to stimulate economic growth facilitating the creation of jobs and the provision of the district's infrastructure requirements, including social and green infrastructure.*
- *Allocation of land for significant urban extensions.....to the north-east of Dewsbury / Batley to enable housing delivery, which offer:*
 - a) An increased chance of new infrastructure being provided (including new schools and roads as part of site development);*
 - b) Masterplanned sites (offering better chance of quality layouts, design, green infrastructure and higher building specifications)."*

Tackle inequality and give all residents the opportunity of a healthy lifestyle

- *"Allocating / protecting key employment opportunities in areas of high unemployment and deprivation in.....Dewsbury".*

Overall

2.13 Therefore, we believe that the strategy to direct most growth to the main urban areas, including Dewsbury, with further growth adjacent to the existing settlements to deliver housing and employment growth is clearly defined, justified and sustainable.

h) Should the Council's spatial development strategy, as set out on pages 36 and 37 of the Plan, be expressed as a policy?

2.14 **No.** The Spatial Development Strategy provides an overall context and summary of the Council's emerging strategy, the detail is already referred to in other policies or parts of the plan.

2.15 This includes:

- Reference to the allocation of about 165 hectares of employment land is summarised in Table 3 (meeting the employment land requirement) on page 52 of the PDLP SP. The supporting text at paragraphs 7.5 to 7.14 explains the justification behind those figures referred in Table 3.
- The explanation regarding how the amount of land to be allocated in the Local Plan (21,324) has been arrived at is included at Table 5 (Meeting the housing requirement)



on page 66 of the PLP SP. Paragraphs 8.1 to 8.28 of the PDLP SP provide the supporting text.

2.16 Therefore, this part of the plan is not unsound because the SDS is not referred to as a policy. Therefore, it is not necessary to include the SDS as a policy.

i) Does Policy PLP 3 provide a clear framework on locational requirements, in line with paragraph 154 in the NPPF? Does the policy give sufficient recognition to the protection of the Green Belt and the countryside? How will the development of brownfield sites be realised early in the Plan, as set out in criterion 2c?

2.17 **Yes.** We support the overall objective of the policy which provides the policy context to the consideration of the location of new development, for example windfall development as referred to in paragraph 6.8 of the PDLP SP.

2.18 The Council also correctly reflects the need at part 2c of the policy to maintain a five-year supply of housing land. However, we object to the current wording of part 2c on the grounds that there is only reference in this part of the policy to the release of brownfield sites early in the Plan to maintain a five-year supply of housing.

2.19 We believe that the policy is currently inconsistently worded which doesn't reflect the need to ensure the development plans housing and employment needs over the Plan period are met by a range of sources of land, including previously-developed and strategic mixed use allocations, such as MX1905. Therefore, as currently worded the policy it is not justified and effective.

Recommended change

2.20 We therefore recommend parts a and c are amalgamated and worded as follows (please note the underlined wording is our proposed change:

"To ensure the overall housing and job requirements set out in the local plan are delivered and maintaining a five-year supply of housing land, whilst also ensuring opportunities for development on previously developed sites and strategic mixed use sites are realised early in the Plan."