



31 August 2017
Consultee ID: 941843/942144
Matter 2

Kirklees Local Plan Examination

Matter 2 – Spatial Development Strategy

This statement is prepared by WYG Planning Limited (WYG) on behalf of our client Strata Homes (Yorkshire) Limited ('Strata' or 'our client').

WYG submitted representations on behalf of Strata in relation to the Publication Draft Kirklees Local Plan in December 2016 which focused on the decision of Kirklees Council to include as a housing allocation a site known as land between Richmond Park Avenue and Sunnyside Avenue, Roberttown (Local Plan SHLAA Ref No H442).

This response seeks to address the key issues to be discussed at the forthcoming Examination Hearing concerning Matter 2. Please refer to our Hearing Statements to other matters which provides further details on our client's interest in this site.

Our 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 we have previously submitted on behalf of our client.

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

a. Are the boundaries of the sub areas, as established in the Place Shaping chapter, appropriately defined?

We have no objection to the boundaries of the sub areas that have been drawn by the Local Authority. The Plan clearly identifies the distinguishing features between the sub areas in terms of their characteristics, their landscape qualities and the role and function the settlements perform. It is, however, worth mentioning that in some instances it may be difficult to clearly decipher a clear separation between certain sub areas. For example, at Paragraph 5.9 of the draft Local Plan Strategy and Policies reference is made to the built up areas of Heckmondwike, Batley and Dewsbury merging into one urban area and therefore the sub areas of Dewsbury and Mirfield and Batley and Spen may in some instances be difficult to differentiate.

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?

We consider that the vision for Kirklees at Page 21 of the Local Plan provides a clear focus and ambition as to how Kirklees will be seen in 2031.

There is clearly a strong emphasis on retaining the local character and distinctiveness of Kirklees and the focus on delivering growth within the context of the four sub areas will ensure that this is achieved whilst taking into account the special characteristics of these areas.

We particularly welcome the reference within the vision of ensuring Kirklees will have a mix of high quality housing which offers choice and meets the needs of all the communities. Also the focus on ensuring that places are well connected through the encouragement of sustainable travel is supported.

c. The Plan seeks to fully meet the objectively assessed employment and housing needs for the district, and proposes an urban focus with some releases of land from the Green Belt. What alternative strategies were appraised and why were they discounted?

No comment to this question.

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?

The Council have conducted a sound evidence base to justify that 'most growth' should be focused on the main areas of Huddersfield and Dewsbury. It is clear from the settlement study that these two settlements accommodate a broad range of services and facilities together with public transport services and infrastructure provision and other related infrastructure provision. The emphasis placed by the Council on these two settlements to accommodate growth is therefore not an unreasonable approach to adopt.

Having regard to placemaking characteristics, sustainable principles of development as well as other constraints which include the role and function of Green Belt, the Spatial Development Strategy outlines a clear approach to how the distribution of growth should be facilitated within Kirklees. The success of delivering the strategy is dependent upon allocating a range of development opportunities that relate to the urban areas of Huddersfield and Dewsbury and are available, suitable and achievable.

e. What is the Council's spatial development strategy for other parts of Kirklees? Is the strategy and distribution of growth clearly defined in the Plan and justified? How have place-making principles (an area's character, constraints and opportunities) been balanced against settlement sustainability?

It is clear from the spatial development strategy for other parts of Kirklees that the distribution of housing need across the district's settlements remains relatively flexible and there is a preference expressed by the Council not to set distinct targets for the sub areas. We think this approach has been useful to ensure that the Council has not predetermine the capacity for growth for each of the sub areas and this has allowed a range of important considerations to be assessed including:

- The overall spatial vision and strategic objectives;
- Placemaking aspects;
- The role and function of Green Belt;
- Sustainability principles.

Irrespective of the approach that has been adopted by the Council, there is no overview reference point in the policy or explanatory text to indicate the level of housing growth that should be apportioned to the different sub areas in terms of distributing the identified need of 21,324 new dwellings. Therefore, whilst the spatial development strategy specifically refers to the level of growth to be apportioned to Huddersfield and Dewsbury a separate table indicating the approximate number of dwellings designated to each of the sub areas having regard to the evidence base would give the plan increased clarity.

In terms of balancing place making principles against settlement sustainability, we think many of the constraints and opportunities that have been identified by the Council for each of the sub areas are also linked to achieving patterns of development that are strong in terms of their sustainability credentials. For example, within the Batley and Spen sub area in the 'Strengths/Opportunities for Growth', there is reference to Batley, Clekheaton and Heckmondwike centres providing for the food shopping needs of residents. Given there is a alignments between both placemaking and sustainability principles, together with the clear rationale in terms of the methodology that has been used for

identifying housing and employment allocations we consider that the strategy and distribution of growth has been fully justified by the Council.

f. Is the proposed allocation of land at Storthes Hall justified and consistent with the Council's spatial development strategy?

We consider that this question is for other parties to address.

g. Does the spatial development strategy in the Plan provide a clear framework in respect of retail and office development?

We consider that this question is for other parties to address.

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

We see no reason why the Council's spatial development strategy should be expressed as a policy as it is already identified as a key statement of the Local Plan strategy. However, it is noted that there is no specific policies that set out a summary of either the employment or housing allocations and so there may be some merit in changing the statement to a policy to add a degree of clarity.

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?

We consider that the policy objectives of Policy PLP 3 is acceptable in the context of considering the location of new development other than allocations in the Local Plan that have already been assessed against similar requirements prior to their inclusion within the Local Plan.

The Council correctly reflects the need at Part 2c of the plan 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 reference in this part of the policy to the release of brownfield sites early in the plan to maintain a five-year housing land supply. We believe that the policy is inconsistent with the Framework as it is important to ensure that housing needs over the Plan Period are met by a wide range of sites including previously developed and greenfield opportunities such as allocation H442. Therefore, as currently worded the policy is not justified as effective.

We therefore recommend an amendment as follows:

'To ensure the overall housing and job requirement 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 housing allocations are released early in the plan.'