

Hearing Statement – Matter 2

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 2: Spatial development strategy
- 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 2 of the Examination in Public.

2. 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?

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

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

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?

2.2. Miller Homes supports the approach towards place shaping on a sub-area basis. Kirklees has distinct character areas from Huddersfield, through to North Kirklees and urban regeneration areas, through to rural towns and villages.

2.3. The Dewsbury and Mirfield context (Section 5.2) recognises that:

- Dewsbury is less than 10 minutes from Leeds on the train
- Dewsbury is an important public transport hub
- Relatively good motorway links to M62 and M1
- Strong housing market areas of Mirfield and outskirts of Dewsbury
- Attractive buildings and townscape in Dewsbury
- Established greenway network and Dewsbury Country Park
- Potential to enhance river and canal corridors to help attract investment and provide an attractive setting
- The regeneration of Dewsbury as a place to live, work and invest

2.4. This context creates the opportunity to revitalise and rejuvenate Dewsbury. However, as highlighted in our original representations and this Statement, Miller Homes does not

believe that this context has transcended through the Plan in relation to other policies and site allocations.

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?

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

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?

2.6. Miller Homes supports the focus for growth to be towards Huddersfield and Dewsbury. The regeneration of Dewsbury, and particularly South Dewsbury, has been a priority for a significant period of time. The now revoked Yorkshire and Humber Plan Regional Spatial Strategy (2008) identified in Policy LCR1 that South Dewsbury/North Kirklees was an area where regeneration and growth needs to be encouraged stating “develop Dewsbury’s role as a Principal Town by delivering regeneration and housing renewal and development”.

2.7. This approach was expanded through RSS Policy LCR2 which identified a key target “to support housing renewal and replacement in South Dewsbury/North Kirklees through land reclamation, and site assembly, road improvements, and improved public transport links between Dewsbury and Huddersfield and Leeds.

2.8. Masterplans, studies and frameworks have been undertaken over the years with the objective of securing the renaissance of Dewsbury. The North Kirklees Strategic Development Framework (2008) sought to form an overarching regeneration framework and to invest in the distinct and diverse character of each town. The masterplan for South Dewsbury mirrored principles established through the South Dewsbury Housing Market

Renewal programme and created smaller masterplans for Saville Town, Thornhill Lees, Scout Hill and Ravensthorpe with the aim of producing a joined up approach to secure transformational change. The key objectives of the masterplan include improving the housing offer, enhancing the neighbourhood centres, creating better linkages to the River Calder and exploiting the riverside location.

- 2.9. The Dewsbury Strategic Development Framework (2010) set a 25 year vision for the renaissance of Dewsbury as a thriving market town. Its key themes are: harnessing the potential of its young people; retaining and enhancing its distinctive retail economy; and reconnecting its hinterland with the town centre via neighbourhood gateways.
- 2.10. The Leeds City Region is ambitious and seeks to unlock the areas potential and develop an economic powerhouse that will create jobs and prosperity. The North Kirklees Growth Zone (NKGZ) is located at the centre of West Yorkshire and has good connections to the Leeds City Region and the Northern Powerhouse. The NKGZ offers the potential for economic growth that will address the underlying economic conditions of an important part of the City Region to enable it to contribute to higher productivity and employment.
- 2.11. However, although Miller Homes is encouraged by the reference towards a regeneration focus on Huddersfield and Dewsbury as indicated in the Kirklees Economic Strategy, they are concerned that this is not fully reflected and enshrined through all policies and designations in the Plan and there appears to be a lack of a joined-up approach.
- 2.12. 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.
- 2.13. 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.**

- 2.14. Miller Homes is therefore concerned that the approach portrayed does not fully address national guidance through the Framework and PPG.

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?

- 2.15. Miller Homes **supports** the identification of new housing in Scholes (Holmfirth), which is a sustainable settlement adjacent to the town of Holmfirth. The 'Kirklees Draft Local Plan Technical Paper: Settlement Appraisal (November 2015) and the 'Draft Local Plan Technical Paper: Spatial Development Strategy and Settlement Appraisal' (November 2016) considers the sustainability of settlements having regard to economic, social and environmental factors and the 2015 Study provides heat maps to illustrate accessibility to a range of services. The heat maps identify that Scholes has access by public transport to a range of services including primary schools, secondary schools, further education, GPs, local, town and district centres.
- 2.16. Within Scholes are a number of services and facilities including access to bus stops, Post Office and general store, hot food takeaway, public house, hairdressers, local sporting facilities, chapel, child nursery care and Junior and Infant School. Furthermore, within a 2km walking distance of Scholes are further facilities and services including employment parks, garden centre and restaurant and cafes along with Holmfirth Town Centre which provides a wider variety of local employment, community, health, retail and leisure services and facilities as well as a bus station.
- 2.17. Scholes is well located for new housing opportunities. It is an attractive and sustainable place to live and offers a good range of activities for the community, and access to a range of key services by public transport and sustainable methods.

2.18. The allocation of new housing in Scholes fully accords with the principles of the Framework and the Spatial Development Strategy of the Plan.

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

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

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

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

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

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

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?

2.22. Miller Homes is encouraged by the approach towards the Spatial Development Strategy and locations for growth. The focus of development will understandably be towards Huddersfield and Dewsbury but in relation to Part 1, the scale of development will reflect:

- The settlement's size, function and character; and
- Spatial priorities for urban renaissance and regeneration; and
- The need to provide for new homes and jobs;

2.23. Furthermore, the final part of the policy emphasises that development will be permitted where it supports the delivery of housing and employment growth in sustainable way taking account of:

- Delivering the housing and job requirements set out in the local plan;
- The need to maintain a supply of specific deliverable sites, in accordance with national policy;
- Ensuring delivery of housing and jobs in smaller settlements to meet local housing and employment needs.

2.24. These sets of principles enshrined in Policy PLP3 create an agenda that the Plan should follow.

j) What effect will the Plan's growth and spatial development strategy have on air quality and carbon emissions?

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

Proposed Change

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

- Ensure that the regeneration aspirations for Dewsbury are woven through the Plan into all policies and allocations and the Plans internal conflicts are removed.