

Hearing Statement – Matter 2

Kirklees Local Plan

On behalf of Taylor Wimpey

August 2017



I. Introduction

- I.1. This is a Hearing Statement prepared by Spawforths on behalf of Taylor Wimpey in respect of:
- Matter 2: Spatial development strategy
- I.2. Taylor Wimpey 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 Taylor Wimpey's comments upon the submission version of the Kirklees Local Plan, dated December 2016.
- I.4. Taylor Wimpey has also expressed a desire to attend and participate in Matter 4 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. Taylor Wimpey 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. Taylor Wimpey is concerned that the Plan’s Vision and Place Shaping principles are not being implemented through the Plan. Taylor Wimpey believes that the approach site allocations and approach in the Plan is contrary to the Spatial Development Strategy and does not accord with Policy PLP2 on Place Shaping or the principles of sustainable development. The Spatial Development Strategy states that proposed allocations have been based on focussing development on settlements where there is a greater level of services/facilities and adopting a place based approach which considers the role and function of settlements.

2.3. Taylor Wimpey does not believe that such an approach has been undertaken in the Rural Sub-Area. It is particularly evident from the evidence base that Shelley is a sustainable settlement which should be accommodating a level of housing and that it should be accommodating more housing than smaller and less sustainable housing and less accessible settlements, including Uperthong, Stocksmoor, Netherthong, Holmbridge and Hade Edge. It is particularly concerning that no exceptional circumstances or justification has been provided for Green Belt releases in such small settlements. **Taylor Wimpey therefore considers that the proposed Plan is internally inconsistent.**

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?

2.4. Taylor Wimpey 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?

2.5. Taylor Wimpey is concerned that the Council is not applying the Spatial Development Strategy appropriately. Taylor Wimpey is concerned with the distribution of housing allocations in the Kirklees Rural Sub-Area. Taylor Wimpey is particularly concerned that Shelley, which is a major settlement in the rural area, is proposed to include no new housing for the next 15 years up to 2031.

2.6. The settlement of Shelley which is one of the larger and more sustainable settlements in the Kirklees Rural sub-area has no housing allocations and two safeguarded sites, which are undeliverable. Shelley scores favourably in the settlement appraisal and is considered to have good accessibility to services and facilities. It is therefore concerning that Shelley is proposed to have no new housing during the Plan period.

2.7. Taylor Wimpey objects to smaller and less sustainable settlements having sizable allocations relative to the scale and size of settlement when the settlement of Shelley has no housing allocations appropriate to its size, function and role. The approach taken appears to be disproportionate. Settlements such as Thurstonland, which is a significantly smaller settlement with less facilities and services has a larger housing allocation, similarly Stocksmoor which is significantly smaller with less services and facilities has two albeit small housing allocations totalling 42 dwellings plus two safeguarded sites, however this is still more than is allocated to Shelley. This list is not exhaustive and there are numerous

examples of significant issues with the distribution of housing allocations in the rural area. Furthermore, in reviewing the Settlement Appraisal Technical Paper it is evident that settlements which score less on accessibility, which do not contain services such as Primary Schools or small shops and services have proposed housing allocations. Therefore, there is a massive and significant under provision in housing in Shelley and Taylor Wimpey considers this spatial distribution needs to be remedied and further provision of housing needs to be identified in Shelley.

- 2.8. This approach is contrary to the Spatial Development Strategy and does not accord with Policy PLP2 on Place Shaping or the principles of sustainable development. The Spatial Development Strategy states that proposed allocations have been based on focussing development on settlements where there is a greater level of services/facilities and adopting a place based approach which considers the role and function of settlements. Taylor Wimpey does not believe that such an approach has been undertaken in the Rural Sub-Area. It is particularly evident from the evidence base that Shelley is a sustainable settlement which should be accommodating a level of housing and that it should be accommodating more housing than smaller and less sustainable housing and less accessible settlements, including Uperthong, Stocksmoor, Netherthong, Holmbridge and Hade Edge. It is particularly concerning that no exceptional circumstances or justification has been provided for Green Belt releases in such small settlements. **Taylor Wimpey therefore considers that the proposed Plan is internally inconsistent.**

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?**

- 2.9. Taylor Wimpey is concerned with the distribution of housing allocations in the Kirklees Rural Sub-Area. Taylor Wimpey is particularly concerned that Shelley, which is a major settlement in the rural area, is proposed to include no new housing for the next 15 years up to 2031.

- 2.10. The settlement of Shelley which is one of the larger and more sustainable settlements in the Kirklees Rural sub-area has no housing allocations and two safeguarded sites, which are undeliverable. Shelley scores favourably in the settlement appraisal and is considered to have good accessibility to services and facilities. It is therefore concerning that Shelley is proposed to have no new housing during the Plan period.
- 2.11. Taylor Wimpey objects to smaller and less sustainable settlements having sizable allocations relative to the scale and size of settlement when the settlement of Shelley has no housing allocations appropriate to its size, function and role. The approach taken appears to be disproportionate. Settlements such as Thurstonland, which is a significantly smaller settlement with less facilities and services has a larger housing allocation, similarly Stocksmoor which is significantly smaller with less services and facilities has two albeit small housing allocations totalling 42 dwellings plus two safeguarded sites, however this is still more than is allocated to Shelley. This list is not exhaustive and there are numerous examples of significant issues with the distribution of housing allocations in the rural area. Furthermore, in reviewing the Settlement Appraisal Technical Paper it is evident that settlements which score less on accessibility, which do not contain services such as Primary Schools or small shops and services have proposed housing allocations. Therefore, there is a massive and significant under provision in housing in Shelley and Taylor Wimpey considers this spatial distribution needs to be remedied and further provision of housing needs to be identified in Shelley.
- 2.12. This approach is contrary to the Spatial Development Strategy and does not accord with Policy PLP2 on Place Shaping or the principles of sustainable development. The Spatial Development Strategy states that proposed allocations have been based on focussing development on settlements where there is a greater level of services/facilities and adopting a place based approach which considers the role and function of settlements. Taylor Wimpey does not believe that such an approach has been undertaken in the Rural Sub-Area. It is particularly evident from the evidence base that Shelley is a sustainable settlement which should be accommodating a level of housing and that it should be accommodating more housing than smaller and less sustainable housing and less accessible settlements, including Uperthong, Stocksmoor, Netherthong, Holmbridge and Hade Edge. It is particularly concerning that no exceptional circumstances or justification has been provided for Green Belt releases in such small settlements. **Taylor Wimpey therefore considers that the proposed Plan is internally inconsistent.**

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

2.13. Taylor Wimpey 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?

2.14. Taylor Wimpey 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?

2.15. Taylor Wimpey 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?

2.16. Taylor Wimpey 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 I, 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;

2.17. 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.

2.18. These sets of principles enshrined in Policy PLP3 create an agenda that the Plan should follow. These sets of principles and criteria allow for the potential for housing allocations in smaller settlements in the Kirklees Rural area, which has been proposed in a number of instances. However, unfortunately in the case of Shelley the level of new housing proposed does not reflect the size and status and sustainability of the settlement or the Council's own evidence. **The Council propose zero new homes in Shelley in the Plan period, which is concerning and unsound given the scale and function of the settlement, particularly when substantially smaller settlements contain large housing allocations.**

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

2.19. Taylor Wimpey has no specific comment in relation to this issue.

Proposed Change

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

- Ensure housing allocations reflect the Spatial Development Strategy
- Review the distribution of housing in the Kirklees Rural Sub-Area
- Identify housing allocations in Shelley, in accordance with the Spatial Development Strategy
- Allocate housing site H169/H2731 off Penistone Road in Shelley