

Kirklees Local Plan Examination Hearing Statement

Our ref NLP/ATu
Date September 2017

Subject: Matter 2: Hearing Statement on behalf of M62 Developments Limited – Spatial Development Strategy

1.0 Introduction

1.1 This Hearing Statement has been prepared by Lichfields on behalf of M62 Developments Limited and responds to the questions set by the Inspector in relation to Matter 2.

1.2 M62 Developments Limited is the landowner of site H523: Land at White Lee Road, Batley and has previously promoted it through the planning system jointly with Jones Homes (Yorkshire) Limited. This Hearing Statement should therefore be read in conjunction with the representations submitted during the Local Plan Consultation (2016) in relation to Land at White Lee Road, Batley (representor ID: 968476).

2.0 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?

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?

2.1 M62 Development Limited’s response to each of these sub questions is set out below.

Is the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury clearly defined?

2.2 M62 Developments considers that the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury is not adequately defined. There should be more definition of the extent of the ‘main urban areas’ and an assessment of the growth apportioned to these areas and how the balance is to be met elsewhere. Without these clarifications, it will not be possible to determine whether the strategy is achievable or measure its success.

Is the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury justified?

2.3 The strategy to focus the largest amount of growth in the main urban areas of Huddersfield and Dewsbury is supported in principle. However, appropriate requirements should also be identified and met in other settlements which at present do not have sufficient housing allocations to reflect their size and infrastructure. For example, M62 Developments Limited is

concerned that the level of new housing proposed within the Batley area over the plan period (725 dwellings) does not reflect the size, status, function and sustainability of this settlement.

2.4 Batley is one of the largest settlements in Kirklees, it scores favourably in the Settlement Appraisal (BP17) and has good accessibility to services and facilities. M62 Developments Limited therefore considers that further housing provision needs to be identified in Batley over the Plan period. This would accord with the approach towards place shaping for Batley and Spen as set out in draft policy PLP2.

2.5 It is also concerning that Green Belt sites are proposed for release elsewhere within the authority ahead of sustainable, non-Green Belt sites such as site H523 Land at White Lee Road. This is contrary to national planning policy and non-Green Belt land should be prioritised for allocation over Green Belt release in line with national planning policy and the Housing White Paper.

Is the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury sustainable?

2.6 Although the strategy to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury may be sustainable in principle, appropriate levels of growth also need to be identified for other smaller, well serviced settlements throughout the authority in order to achieve true sustainability.

2.7 As is set out above, the level of new housing proposed within the Batley area over the plan period does not reflect the size, status, function and sustainability of this settlement. Batley is a Town Centre and is one of the largest settlements in Kirklees; it scores well in the Settlement Appraisal (BP17) and has good accessibility to services and facilities. M62 Developments Limited therefore considers that further housing provision needs to be identified in Batley over the plan period.

2.8 Furthermore, as currently drafted, the Plan seeks to provide a large number of homes on the edge of Huddersfield and Dewsbury through large scale Green Belt release in order to meet the aim to provide ‘most growth’ in these settlements. This approach has been progressed, even though these sites are not located within the ‘main urban areas’. This is evidenced beneath Table 1 on page 37 of the Plan which attempts to clarify that:

‘For the purposes of assessing the distribution of housing the strategic sites at south Dewsbury and Chidswell are considered to be part of Dewsbury’

2.9 Therefore, although a strategy to focus growth in the main urban areas of Huddersfield and Dewsbury may be sustainable in principle, this is not what the Plan is currently promoting. The allocation of very large sites on the edge of Huddersfield and Dewsbury will not make optimum use of the urban capacity of key settlements and this is not the most sustainable approach in light of other development options.

To what extent will the aim to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury be achieved?

2.10 The aim to focus ‘most growth’ in the main urban areas of Huddersfield and Dewsbury will not be substantially achieved through the housing and mixed use allocations currently proposed.

2.11 This is because the majority of housing proposed through the site allocations is not located within the main urban areas of Huddersfield and Dewsbury. In contrast, the majority of this

housing will be provided within three large allocations (sites H2089, MX1905 and H1747) located on the edge of these settlements, remote from their town centres and existing infrastructure provision.

2.12 The Plan also dismisses a number of sustainable and deliverable sites that are located within urban areas and smaller non-strategic edge of settlement sites with good access to local services. Site H523 Land at White Lee Road is an example of such a site. This site is available, suitable and achievable, it is deliverable in accordance with the National Planning Policy Framework and represents a sustainable residential opportunity within an established residential area. This site occupies a highly sustainable location with good proximity and access to town centres (Batley and Heckmondwike) and the M62 corridor and could be developed within the early part of the plan period with no harm to the wider Green Belt.

2.13 There are also serious concerns about the deliverability of the three large strategic housing and mixed use allocations (sites H2089, MX1905 and H1747). These concerns are set out in detail in M62 Development Limited's Hearing Statement on Matter 4, which concludes that these sites will not deliver the amount of housing stated in the Plan due to site specific constraints and unrealistic assumed lead-in times and delivery rates. The housing deficit that would result from a failure to deliver these sites in full makes it impossible to predict whether the spatial development strategy will be achieved, unless more sites are identified to make up for this shortfall.

Summary

2.14 On the basis of the above, M62 Developments Limited considers that the proposed Plan is not positively prepared, effective or justified and does not fully address national planning policy guidance. The Plan is therefore unsound.

Proposed Change

2.15 To overcome the objection and address soundness matters, the Plan should:

- Clearly define 'main urban area' and 'most growth'
- Revisit rejected sites to ensure a more balanced approach and to achieve sustainable development throughout the authority
- Ensure that housing allocations reflect the Spatial Development Strategy
- Identify additional housing allocations in Batley
- Allocate housing site H523, Land off White Lee Road, Batley