

**Kirklees Local Plan Examination****Stage 4 hearings - Other Site Allocations - Dewsbury and Mirfield Sub-Area****H2089 – land south of Ravensthorpe Road / Lees Hall Road, Dewsbury (2,310 dwellings within the Plan period, 1,690 dwellings beyond the Plan period)**

*j) The housing trajectory indicates that 710 dwellings will come forward within five years, with the first units delivered in 2018/19. Are the estimated delivery timescales reasonable and justified?*

*k) What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Dewsbury and Thornhill be affected? Are there exceptional circumstances that justify altering the Green Belt? Is there evidence to demonstrate that the section of the site likely to come forward beyond 2031 would be justified and needed to meet housing requirements in the longer term?*

- 1.1 We have significant concerns that this site's delivery trajectory in the first 5 years of the Plan period is not achievable. Should the Local Plan not be able to demonstrate a deliverable supply of housing sites in the first five years of the Plan period, the Local Plan could be found unsound. The allocation of additional sites for housing which are available, suitable, achievable and deliverable within the first five years of the Plan period would ensure the plan is found sound and can be adopted.
- 1.2 The Housing Supply Topic Paper produced by Kirklees Council in December 2017 (EX30-2) provides the most recent housing projections for this proposed allocation. The projections indicate that the first 45 dwellings will be completed in 2018/2019. Given the recent approval of planning permission at Lees Hall Road (ref: 2016/94117) and Ravensthorpe Road (ref: 2016/94118) for a combined 240 dwellings this projection would appear achievable. However, at the date of submitting this representation, there have been no applications for Reserved Matters or to discharge any of the conditions attached to either outline consent. The outline planning permissions contained conditions which required the submission, approval and carrying out of remediation strategies. These conditions regarding contamination and remediation, while typically standard for contaminated sites, can inevitably delay a start on site.
- 1.3 Table 5 of the Housing Supply Topic Paper provides updated parameters for lead-in times. For sites where outline planning permission has been granted, but no Reserved Matters application had been submitted by 01/04/2017, this table indicates that delivery on site would not be until 2019/2020. This is at odds with the Council's projection of delivering 45 dwellings in 2018/2019 on a site where no reserved matters application has been submitted to date.
- 1.4 The prediction that 45 dwellings would be completed in the 2018/2019 period would appear unrealistic and unachievable.
- 1.5 The Housing Supply Topic Paper December 2017 (EX30-2) provides a table indicating the expected build-out rates for this proposed allocation across the Plan period. The expected delivery in the first year (2018/2019) is 45 dwellings, rising to 130 dwellings in 2019/2020, 175 dwellings in 2020/2021 and levelling off at between 180 to 210 dwellings per annum in the later Plan period. The annual build rates for this proposed allocation are not based on the Council's 2014 Strategic Housing Land Availability Assessment. The 2014 SHLAA provides a likely build rate of 50 dwellings per annum on large sites (200 or more dwellings). The build rate for this prospective allocation would be four times the build rate of that considered likely in the SHLAA 2014. The projected build rate is also significantly higher than any other site in the Housing Supply Topic Paper, even where a unique build-rate is applied to larger sites.

- 1.6 For example, at Land North of Bradley Road, Bradley, Huddersfield (ref: H1747), which has an indicative capacity of 1,577 dwellings, the projected build rate is 120-171 dwellings per annum. This site has the second highest projected build rate in the Housing Supply Topic Paper behind the site H2089. There does not appear to be explicit interest in this site (H1747) by a national housebuilder but there has been discussion with Miller Homes (see SS2: Bradley masterplan delivery statement (phase 2)) to promote this site in tandem with an adjoining site (H351). These build out rates have been applied based on a phasing strategy by the land promoter. There is no discussion in the submissions of a joint venture agreement with national housebuilders to bring the site forward. For this site to deliver the projected build rates of 120 to 170 dwellings per annum, joint venture agreements between multiple housebuilder could be required, which would inevitably lead to delays in implementation of infrastructure and dwellings.
- 1.7 The build out rates on the subject site (H2089) are based on a phasing strategy produced by Miller Homes. The phasing strategy has been replicated in the Council's Housing Supply Topic Paper to indicate the projected build rates. The submissions by Miller Homes do not indicate that Miller will be the only national housebuilder to deliver the full allocation of 2,310 dwellings. However, the submissions also do not provide details of other delivery partners. The projected build rates have been accepted in the Housing Supply Topic Paper, and are included within the 5 year housing land supply calculations, without sufficient justification or explanation for the increase in delivery on this site compared to other sites in the Local Plan.
- 1.8 The build rates on this site (H2089) and by extension the site at Bradley (H1747) have also been accepted as exceptions to the likely build rates in the SHLAA 2014, apparently without interest from a national housebuilder or a provisional agreement between housebuilder to deliver the masterplan scheme.
- 1.9 In circumstances where the exceptional build-rates for these two sites have not been demonstrated, we have applied the likely build rates from the SHLAA 2014. The site H1747 would deliver only 200 dwellings in the first 5 years of the Plan Period compared to 480 in the Housing Supply Topic Paper. The site H2089 would deliver only 250 dwellings, compared to 710 in the Housing Supply Topic Paper. These two sites could indicatively deliver 740 fewer dwellings in the first 5 years of the Plan period than anticipated by the Council.
- 1.10 We have reserved this representation to the significant Green Belt release and proposed housing allocation at land south of Ravensthorpe Road / Lees Hall Road, Dewsbury (H2089). However, if the standard and likely housing delivery build rate from the SHLAA 2014 was applied across all larger housing allocations and replaced the bespoke build rates, the Local Plan could be found unsound due to a lack of a deliverable 5 year supply of housing sites to meet the identified shortfall.
- 1.11 The Dewsbury and Mirfield Sub-Area is particularly reliant on this allocation (H2089) to deliver the identified need found in the Council's 'Additional evidence relating to distribution of growth between settlements', December 2017. In this Sub-Area, the Local Plan proposes to release land for 3,094 dwellings in the Green Belt. This allocation accounts for 2,310 dwellings, or 75% of the Green Belt land to be released in the Dewsbury and Mirfield Sub-Area.

- 1.12 One significant concern we have with the Council's evidence relating to distribution of growth between settlements, is the assessment that this proposed allocation is classed as being within or adjoining Dewsbury and not Ravensthorpe/Thornhill. Dewsbury has a higher sustainability score than Ravensthorpe and Thornhill. However, the site is situated principally on the southern boundary of Ravensthorpe and Thornhill. The nearest train station is found in Ravensthorpe and the services in Ravensthorpe are within closer walking distance from the site than those in Dewsbury. It is simply difficult to reconcile why this site, which does not share a boundary with Dewsbury, but shares two existing Green Belt boundaries with Thornhill and Ravensthorpe has been attributed to Dewsbury in the summary of Settlement Growth findings.
- 1.13 The sustainable characteristics of this site and its proximity to services appear to be measured against inaccurate baseline assessments. The settlements of Ravensthorpe and Thornhill could potentially accommodate Green Belt releases. However, the Green Belt around Mirfield and Dewsbury could contain significantly more sustainable sites which have been considered and disregarded in favour of this site (H2089).
- 1.14 To ensure the plan is found sound, additional housing allocations should be considered for release, which may include removing land from the Green Belt in the more sustainable settlements of Mirfield and Dewsbury. The enclosed representations from previous consultations on the Local Plan provide an assessment of one of these Green Belt sites and which we intend to discuss at the forthcoming Hearing sessions in February 2018.