



Kirklees Local Plan Examination Stage 1 – Initial Hearings

Matters, Issues and Questions (MIQs)

1.0 INTRODUCTION

- 1.1 This statement has been prepared by WYG on behalf of the Church Commissioners for England (herein referred to as “our client”) who have an interest at Leeds Road, Chidswell. By way of reference, our client’s land is referred to as *Land East of 932-1110 Leeds Road, Shawcross/Woodkirk, Dewsbury* (Draft Allocation Reference MX1905).
- 1.2 Our client’s site has been identified to deliver 1,535 dwellings, and 122,500sqm of employment development during the Plan period. They are therefore very keen to engage and assist in the preparation of a sound Local Plan which is positively prepared, justified, effective and consistent.
- 1.3 This response seeks to address the key considerations to be discussed at the forthcoming Kirklees Local Plan Examination Stage 1- Matter 8 Approach to site allocations and Green Belt release.
- 1.4 The 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 by WYG on behalf of our client to the Publication Draft Local Plan in December 2016.

2.0 MATTER 8 – APPROACH TO SITE ALLOCATIONS AND GREEN BELT RELEASE

Issue – Is the Plan’s approach to identifying site allocations (housing, employment and mixed use), safeguarded land and Green Belt releases soundly based and in line with national policy?

Policy PLP 6

[Note – this will cover the general approach to site selection and the Green Belt. Issues relating to individual site allocations will be considered at Stage 4. All matters relating to minerals and waste allocations will be covered at Stage 2]

a) Has the Council undertaken a robust and comprehensive assessment of development capacity within existing urban areas and other areas outside the current Green Belt?

- 2.1 **Yes.** The Council’s comprehensive evidence base includes the following documents, which are of relevance to this question:
- BP17 (Technical Paper – Spatial Development Strategy and Settlement Appraisal) (April 2017);
 - BP29 – Accepted Site Options – Technical Appraisals;
 - BP29.1 – Accepted Site Options – Technical Appraisals – Revised July 2017
 - LE3 – Kirklees Publication Draft Local Plan – Rejected Site Options Maps;
 - LE4 – Kirklees Publication Draft Local Plan Rejected Site Options Report;
 - LE4.1 – Kirklees Publication Draft Local Plan Rejected Site Options Report – Revised July 2017; and
 - LE17 Strategic Housing Land Availability Assessment.



BP17

- 2.2 Paragraph 1.4 of BP17 states that in preparing the Local Plan, the Council set out three broad approaches to assigning the distribution of growth for housing and other forms of development. The Council selected approach 3 – allocating development based on an area's character and the size of its settlements.
- 2.3 Approach 3 assesses the potential of each of the Local Plan's four identified sub-areas to grow, but also acknowledges the size and function of each settlement in the sub-area. Paragraph 2.7 of BP17 states that this means that development would be allocated to places based on their ability to help the Council achieve the Local Plan's overall objectives, rather than simply on their existing size.
- 2.4 Approach 3 did not result in a settlement hierarchy but combines the evidence of the Council's settlement appraisal, together with other evidence such as the place shaping constraints and opportunities, as well as existing and planned infrastructure.
- 2.5 Chapter 9 (Settlement Appraisal Methodology) of BP17 explains the methodology process of the Settlement Appraisal and how it can be implemented to assess the relative sustainability of settlements in Kirklees. They have been assessed individually and arranged by the four sub-areas. Paragraph 9.3 includes those indicators that were assessed for each settlement, which includes those within the following categories:
- Local Profile;
 - Accessibility rating; and
 - Local Services.
- 2.6 Sections 11 to 14 of BP17 presents the results of the local information, as well as the accessibility ratings which collectively provide a full picture of the opportunities and challenges for each sub-area, and how, the Local Plan spatial strategy has addressed these.

BP29.1

- 2.7 BP29.1 includes those accepted development options (that are not minerals related or currently in the Green Belt) in the Publication Draft Local Plan. The development options are split into the following categories:
- Employment – page 2 to 11;
 - Gypsies and Traveller and Travelling Show people – page 12 to 13;
 - Housing – 14 to 124;
 - Mixed Use – page 143 to 151; and
 - Safeguarded Land – page 152 to 179.
- 2.8 We have not referred to those sites related to minerals, as it is not considered relevant in the context of the number of sites proposed for development (i.e. new homes, employment etc).

LE4.1

- 2.9 LE4.1 is split into two parts. The first part of the report includes a summary table of those existing 20 urban greenspace sites where the designation was proposed to be removed. However, this was not accepted by the Council.
- 2.10 Part two includes those rejected options for the following development type:



- Employment – page 20 to 71;
- Gypsies and Traveller and Travelling Show people – page 72 to 88;
- Housing – page 89 to 483;
- Mixed Used Use Rejected Options – page 493 to 507; and
- Safeguarded Land Rejected Options – page 508 to 528.

2.11 Each of the part two categories include rejected site options, including both non-Green Belt and existing Green Belt sites that were being promoted for development.

Summary of non Green Belt site options

2.12 Following a review of LE4.1 and BP29.1, the table below provides a summary of the number of site options assessed by the Council for (non-minerals) development not in the Green Belt.

Use	Number of accepted Site Options (BP29.1)	Number of rejected Site Options (LE4.1)	Total
Urban Greenspace (retain as UGS but rejected for deletion)	N/A	20	20
Employment	10	53	63
Gypsies and Traveller and Travelling Show people	2	21	23
Housing	149	300	449
Mixed Used Use	9	10	19
Safeguarded Land	44	12	56
Total	214	416	630

Overall

2.13 The Council has reviewed the existing constraints and opportunities in each of its settlements (BP17) and how the Local Plan spatial strategy has addressed these (paragraph 10.5 of BP17).

2.14 The summary table shows that the Council has undertaken an assessment of the development and capacity of over 600 site options outside the existing UDP Green Belt.

2.15 We believe that this demonstrates a robust and comprehensive assessment within the existing urban areas and other areas outside the current Green Belt.

b) Do exceptional circumstances exist which justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional land for employment uses?

2.16 **Yes.** The Council has identified a full Objectively Assessed Housing Need of c. 31,140 dwellings, which it is seeking to meet in full for the Plan period (2013 to 2031). The Council’s approach to meeting the OAHN in full is in accordance with the NPPF (paragraph 47) and PPG.

2.17 The Council has assessed the development capacities of those sites that it is proposing to allocate for development in the emerging Local Plan and concludes that it does not have enough land (outside the Green Belt) to meet its objectively assessed needs in full.



- 2.18 Therefore, exceptional circumstances exist to review and consequently release land from the Green Belt to meet the shortfall of c. 11,500 new dwellings and additional land for employment is justified. This is in accordance with paragraphs 83 and 84 of the NPPF, and which we support.