

**Miller Homes**

# **Dewsbury Riverside**

High Level Delivery Statement

November 2016



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## **I. Introduction**

- I.1. Spawforths have been instructed by Miller Homes to prepare a High Level Delivery Statement for the site at Dewsbury Riverside.
- I.2. The report will analyse and summarise the technical assessments undertaken on the site and explain the site's availability, suitability and achievability and therefore deliverability in the context of the National Planning Policy Framework.

## 2. National Planning Policy Context

### National Planning Policy Framework (The Framework)

2.1. The Framework sets out the Governments' planning policies for England and how it expects these to be applied. It contains a presumption in favour of sustainable development, which it defines as having three dimensions: economic, social and environmental. The Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

2.2. Part 6 of the Framework confirms the Government's commitment to significantly boost the supply of housing and paragraph 47 states:

*Local planning authorities should:*

- *Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;*
- *Identify and update annually a supply of specific deliverable<sup>11</sup> sites sufficient to provide five years' worth of housing against their housing requirement with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *Identify a supply of specific, developable<sup>12</sup> sites or broad locations of growth, for years 6-10 and, where possible, for years 11-15;*
- *For market and affordable housing, illustrate the expected rate of housing delivery through a trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five year supply of housing land to meet their housing target; and*

- *Set out their own approach to housing density to reflect local circumstances.*

2.3. Footnote 11 defines deliverable as:

To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.

2.4. Footnote 12 defines developable as:

To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

2.5. The issue of viability and deliverability of sites is expanded in paragraph 173 stating:

Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

## National Planning Practice Guidance (PPG)

- 2.6. The PPG provides guidance to support and expand on policies within the Framework, and in that sense does not provide additional policy but rather more detailed consideration of how policies within the Framework should be approached and met.
- 2.7. The PPG expands and explains how to assess sites in terms of available, suitable and achievable and therefore whether sites are deliverable.

### **What factors should be considered when assessing the suitability of sites/broad locations for development?**

Plan makers should assess the suitability of the identified use or mix of uses of a particular site or broad location including consideration of the types of development that may meet the needs of the community. These may include, but are not limited to: market housing, private rented, affordable housing, people wishing to build or commission their own homes, housing for older people, or for economic development uses.

Assessing the suitability of sites or broad locations for development should be guided by:

- the development plan, emerging plan policy and national policy;
- market and industry requirements in that housing market or functional economic market area.

When assessing the sites against the adopted development plan, plan makers will need to take account of how up to date the plan policies are and consider the appropriateness of identified constraints on sites/broad location and whether such constraints may be overcome.

The following factors should be considered to assess a site's suitability for development now or in the future:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed; contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

Para 19 ID 3-019-20140306

#### **What factors should be considered when assessing availability?**

A site is considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners. This will often mean that the land is controlled by a developer or landowner who has expressed an intention to develop, or the landowner has expressed an intention to sell.

Para 20 ID 3-020-20140306



**What factors should be considered when assessing achievability including whether the development of the site is viable?**

A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time.

Para 21 ID 3-021-20140306

**How is deliverability (1-5 years) and developability (6-15 years) determined in relation to housing supply?**

Assessing the suitability, availability and achievability (including the economic viability of a site) will provide the information as to whether a site can be considered deliverable, developable or not currently developable for housing. The definition of 'deliverability' and 'developability' in relation to housing supply is set out in footnote 11 and footnote 12 of the National Planning Policy Framework.

All aspects of a Local Plan must be realistic and deliverable but there are specific requirements in the Framework in relation to planned housing land supply.

Para 29 ID3-029-20140306

**What constitutes a ‘deliverable site’ in the context of housing policy?**

Deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within five years.

However, planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide robust, up to date evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out. If there are no significant constraints (e.g. infrastructure) to overcome such as infrastructure sites not allocated within a development plan or without planning permission can be considered capable of being delivered within a five-year timeframe.

The size of sites will also be an important factor in identifying whether a housing site is deliverable within the first 5 years. Plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.

Para 31 ID 3-031-20140306

**What constitutes a ‘developable site’ in the context of housing policy?**

The National Planning Policy Framework asks local planning authorities to identify a supply of specific developable sites or broad locations for growth in years 6-10 and where possible for years 11-15.

Developable sites or broad locations are areas that are in a suitable location for housing development and have a reasonable prospect that the site or broad location is available and could be viably developed at the point envisaged. Local planning authorities will need to consider when in the plan period such sites or broad locations will come forward so that they can be identified on the development trajectory. These sites or broad locations may include large development opportunities such as urban extension or new settlements.

Para 32 ID3-032-20140306

### 3. Site Location and Proposals

- 3.1. The site is located in a sustainable location and is well defined by existing housing, roads and tracks. Part of the site is an existing UDP housing allocation and part of the site is Provisional Open Land. The site is located on the edge of Dewsbury and Ravensthorpe, which provides shops and services, and also access to public transport facilities, with bus stops located on Lees Hall Road and Huddersfield Road and a train station at Ravensthorpe.
- 3.2. Figure 1 shows the site to the south of Dewsbury, bounded to the north by residential properties along Ravensthorpe Road and Lees Hall Road, to the east and south by tracks, tree belts and woodland and to the west by Sands Lane, Jordan Wood, footpaths and tracks.
- 3.3. The site comprises primarily farmland, but also includes areas which have had a history of mining.

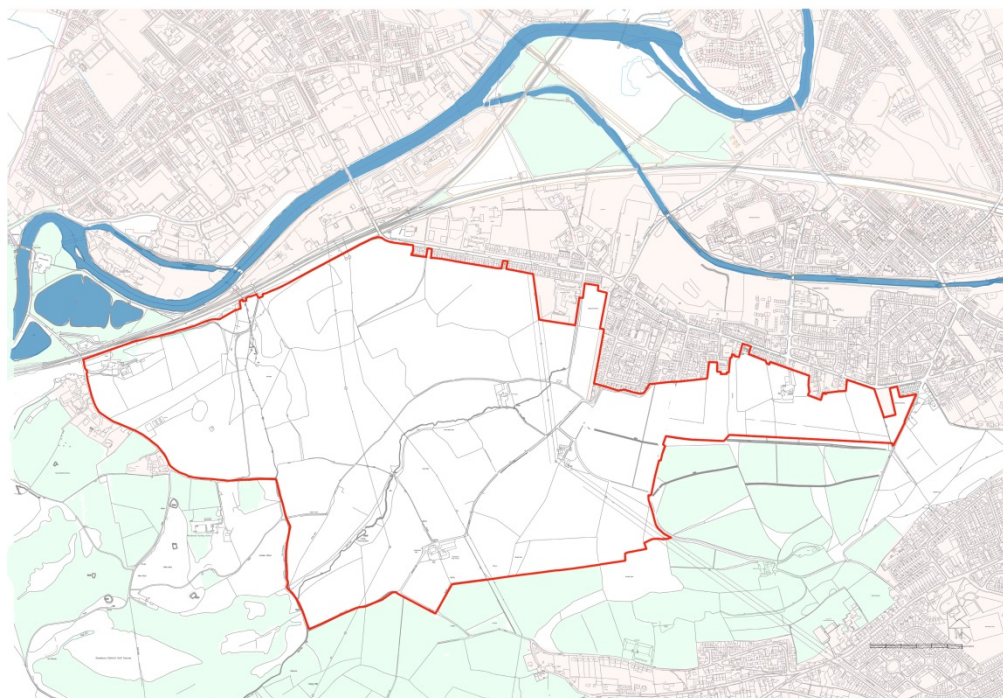


Figure 1: Site Location

#### Dewsbury Riverside Vision

- 3.4. The Vision for Dewsbury Riverside is to create up to 4,000 new homes in an urban extension to the south of Dewsbury, which will be a driver for regeneration. The overall

scheme will create sufficient economic impetus to deliver new infrastructure and regenerate Dewsbury Town Centre, Ravensthorpe and the riverside.

3.5. The Dewsbury Riverside project forms an essential element of the regeneration plans for Dewsbury. The project aims to:

- Deliver the regeneration and urban renaissance of Dewsbury and Ravensthorpe through housing delivery of sufficient quantity to generate transformational change.
- Rejuvenate Dewsbury Town Centre through creation of distinctive quarters, new linkages and reconnection with the Riverside.
- Address all sectors of market demand and affordable housing need in south Dewsbury.
- Enhance the level of service provision and recreation and leisure opportunities.
- Open up the potential for the delivery of improved infrastructure and connections whilst extending and enhancing green corridors and linkages.

3.6. The aim is to regenerate Dewsbury to the benefit of residents, employers, investors and visitors. The aim is to position Dewsbury as a quality place to attract new investors, employment opportunities and housing. The scheme aims to reduce future forecast congestion in Dewsbury and Ravensthorpe and deliver environmental improvements. It will reinstate Dewsbury as a place of economic and cultural activities in the Leeds City Region. In its wider context, the project will act as a catalyst for further investment and development across the Leeds City Region.

3.7. The vision for Dewsbury Riverside is to deliver transformational change and investment in this area and create a high quality gateway. The key element being to drive forward the economy in the region, enhance the residential offer, regenerate the Town Centre, improve the environment, create excellent transport connectivity and improved access to employment opportunities. The redevelopment of the area will accelerate the urban renaissance of Dewsbury and enhance the connectivity between the existing communities and the environment beyond. Creating the potential for new active leisure opportunities

within Dewsbury, promoting healthy living and an improved environment. The renewal of Dewsbury would help the town to achieve its economic growth aspirations over the coming decades. Consequently, it would enhance the effectiveness of previous and ongoing investment to revitalise Dewsbury Town Centre, as well as providing the opportunity to help support and enable housing growth.

- 3.8. In addition, the redevelopment of Dewsbury offers the opportunity to develop the town's road network, improving connectivity and access to neighbouring communities and the Town Centre. It would also allow the coordination of public transport services in the area, enabling better access to employment opportunities across the District and Leeds City Region as a whole. Through such sustainable redevelopment, Dewsbury Riverside will deliver economic, social and environmental benefits and improve the quality of life for its local population and beyond.

#### **Overview of the proposals**

- 3.9. The proposed urban extension to the south of Dewsbury has the capacity for around 4,000 new homes, alongside community facilities, open space, new schools and local centre in order to create a sustainable community.
- 3.10. It is anticipated that in addition to the new local centre which has been located to tie into the heart of the existing Ravensthorpe settlement (to promote cohesion between the new and existing communities), there will be other smaller local centres, close to housing to support walkable neighbourhoods.
- 3.11. Existing green links and corridors will be extended through the proposed residential site and these will connect the green space infrastructure. The green links could also accommodate pedestrian and cycle routes, with an emphasis on safe routes to school.
- 3.12. Sustainable urban drainage features will create further amenity for the open space as well as creating new habitat for links to promote diversity of wildlife species.



## 4. Deliverability

- 4.1. The site is available, suitable and achievable and is deliverable in accordance with the Framework and represents a sustainable residential opportunity on the edge of an established residential area. Miller Homes intends to be lead developer which further demonstrates the site's deliverability.

### Availability

- 4.2. Miller Homes and Kirklees Council control the site and therefore the site is available in accordance with the Framework and PPG.

### Suitability

- 4.3. The proposed development can make an efficient and attractive use of the land. Although Green Belt land the site does represent an excellent opportunity for future housing and development. This site would allow housing to be delivered within an appropriate and sustainable location within Dewsbury.
- 4.4. The site is located within a highly sustainable location on the edge of Ravensthorpe and Dewsbury. The site's development would clearly accord with the emphasis set out in the NPPF, particularly concerning the need to make more efficient use of land. The site benefits from being located close to a range of services and facilities, including local shops, public houses, primary school and other community facilities. The site is also within walking distance to bus routes to Wakefield and Leeds and the train station in Ravensthorpe.

### Green Belt

- 4.5. Part of the site is an existing housing allocation in the UDP and part is Provisional Open Land. The remaining land currently forms part of the West Yorkshire Green Belt. The National Planning Policy Framework (The Framework) explains that there are five purposes of including land within the Green Belt, which is:
- To check the unrestricted sprawl of large built up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;



- To preserve the setting and special character of historic towns;
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4.6. Paragraph 83 of The Framework considers that Green Belt boundaries can change “in exceptional circumstances”. Such a circumstance exists through the significant need to provide housing in Kirklees, and the need for regeneration and renewal in Dewsbury and Ravensthorpe. The aspirations to revitalise the area, which stem from the Housing Market Renewal programme, North Kirklees Strategic Development Framework and the now revoked Regional Spatial Strategy provide the context for Green Belt change, inward investment and urban renaissance.

4.7. The development of this site will not have a significant impact on any of the reasons for the Green Belt designation in the area. The new Green Belt boundaries will be drawn to provide a long term robust boundary. The development will not result in the coalescence of neighbouring towns, and will not encroach on the countryside nor affect the setting and special character of an historic town.

### **Achievability**

4.8. It is considered that development on this site is achievable. There are no known constraints to its development.

4.9. Miller Homes has commissioned a number of technical reports which demonstrate the deliverability of sites, which are summarised below:

### **Highways**

4.10. I-Transport is undertaking highway analysis, which indicates that the site is suitable for residential development.

4.11. The Council has assessed the overall impacts of the proposed land allocations and infrastructure schemes in the emerging Local Plan. This is set out in the background papers forming part of the Local Plan evidence base and specifically in their Technical Paper: Transport Model (November 2015). The report notes that to assess the cumulative transport impacts of the land use allocations in the draft Local Plan, the Council undertook to model strategically the transport network (highway and public transport). The work

identifies locations on the highway network which are forecast to suffer increased delays as a result of the proposals and therefore where the Council needs to concentrate its transport mitigation strategy. It also shows whether the mitigation strategy is able to accommodate the growth over the plan period.

- 4.12. The report concludes that the results of the journey speed analyses show that the average speed across the highway corridors considered is maintained across the plan period. It notes that the evidence backs up the conclusion that at a district-wide level the proposed transport mitigation strategy can accommodate the development proposed in the Kirklees Local Plan period.
- 4.13. Miller Homes and Kirklees Council have commissioned Aecom to undertake further modelling work. This model provides a future year base on which development and transport options can be tested. Aecom are running a series of tests with the model to identify the overall impacts of the Dewsbury Riverside development and to identify potential highways mitigation. An important part of the analysis is to identify the phasing of development in relation to strategic highways improvements. Initial model results have been provided and these are currently being assessed but with the results generally appearing to be positive. Analysis is on-going with the aim of identifying an agreed phasing and mitigation strategy.

### **Ecology**

- 4.14. Aecom are undertaking ecological surveys to support the proposals. There are no statutory nature conservation designations relevant to the site and there are no non-statutory nature conservation designations that are likely to represent constraints.
- 4.15. There are no signs of protected fauna species and no significant flora species. The site is a mixture of arable fields with introduced planted shrubs, improved and poor semi-improved grassland and woodlands, mature trees and hedgerows.
- 4.16. There will be no direct significant adverse impacts on adjacent ecological features. Any potential indirect impacts including risk of pollution during construction and visual impacts will be managed under a construction method statement and through landscaping designs. Ecological survey work and tree surveys are ongoing and ecological enhancement including habitat linkages, retention of key habitat areas such as the woodland and mature trees, and

landscaping can be incorporated into the masterplanning process creating cohesive corridors to support wildlife and retain connectivity of habitats.

### **Ground Investigation**

- 4.17. A Preliminary Geo-Environmental Investigation has been undertaken by Lithos which indicates that the site is suitable for residential development.
- 4.18. The majority of the site is essentially greenfield and no significant contamination is anticipated. Nonetheless, due to previous activities, including mining on some of the site activities remediation and restoration may well be required in certain areas.
- 4.19. Locally, a veneer of made ground associated with existing buildings, hardstand and former railway is anticipated. Deeper made ground associated with a former landfill and backfilled coal pits/ quarries is also anticipated.
- 4.20. Areas of contamination associated with fuel and heating oil tanks (farmyards etc) should be anticipated.
- 4.21. During the operational phase, the proposed development will have a relatively low environmental impact. SUDS will be considered where appropriate. It is unlikely that ground or water contamination will result in any significant impacts.

### **Flood Risk and Drainage**

- 4.22. ARP Associates has undertaken a Flood Risk and Drainage Appraisal. The Assessment shows that the Environment Agency confirms that all of the site falls within land assessed as having less than a 1 in 1,000 annual probability of river or sea flooding in any year (less than 0.1%). Therefore, in accordance with Table 1 of the PPG, the site falls within Flood Zone 1 "low probability". The proposed development site is outside the maximum extent of flooding from reservoirs. There are no other canals or artificial sources which will result in flooding on the proposed development site.
- 4.23. Surface water discharge shall be restricted to no greater than the existing greenfield run-off rate with outfall to watercourse. Attenuation storage will be provided on site to store runoff for up to the 1 in 100 annual probability rainfall events plus allowance for climate change, in line with EA Guidance.

- 4.24. The proposed surface water drainage system shall be designed with an allowance for climate change and restricted to the agreed discharge rate with appropriate attenuation incorporated into the design.
- 4.25. No special mitigation measures are required for emergency egress during times of flood.

### **Cultural Heritage**

- 4.26. BWB Consulting has undertaken a Heritage Assessment, which shows that the site is suitable for residential development. The report shows that there are only two recorded heritage assets within the proposed development site boundary. The site of the former Cromwell Colliery is located in the eastern part of the site. It has been largely demolished and the railway line to it removed and replaced by a track. There are also some potential anomalies within the site which will be further explored prior to development. Due to the sloping nature of the site, views to heritage assets in the vicinity should be considered as part of the masterplanning process.

### **Landscape**

- 4.27. TPM Landscape has undertaken a Landscape Assessment and conclude that the landscape within the proposed masterplan area is characteristic of the wider southern Pennine fringe landscape area.
- 4.28. The site contains many landscape features, including woodlands, allotments, intact hedgerows and quality trees. These features should be integrated into a wider open space network which enhances the existing footpath/ bridleway network. There are some existing detracting elements such as pylons which may be able to be improved or removed within the development proposals.
- 4.29. There are a limited number of long distance views from public locations, and long distance views from residential properties are predominantly from rear windows of terraces on the opposite hillside. Local receptors will experience a change of view, both from residences bordering the masterplan area, and people using the footpath and bridleway network.
- 4.30. The development proposals can be successfully integrated into the landscape by incorporating the followings:
- Create a strong landscape buffer along the southern boundary of the site.

- Retain important existing landscape features, such as woodland, in-tact hedgerows, quality isolated trees.
- Seek to reduce the existing detracting features such as pylons and overhead electricity cables.
- Retain and enhance the existing footpath and bridleway network.
- Create a series of landscape corridors lining the footpath network to maintain the existing links between the residential areas and the open countryside.
- Include a comprehensive Landscape Design Strategy with the development proposals which provides for a quality landscape design, an open space design strategy, street hierarchy and character areas, and a landscape management strategy.

#### **Utilities**

- 4.31. Arup has undertaken a Utilities Services Study which analysed the existing and proposed utilities services for the proposed housing scheme.
- 4.32. Yorkshire Water has confirmed that they are able to provide sufficient water to the development site. This will be supplied from Huddersfield Road. The development will be supplied via a gravity fed system. Off-site main laying and mains extension is required. Northern Powergrid has confirmed there is capacity to supply the development. The report also confirms through consultation with Northern Gas that the gas pipeline under the site can be moved, if required.

## 5. Conclusion

5.1. Miller Homes, along with Kirklees Council control the site at Dewsbury Riverside. This High Level Deliverability Statement has shown that the site is available, suitable and achievable and therefore deliverable in accordance with the Framework and PPG.

5.2. It has been shown that the site would be suitable for development. The site has been reviewed against the Framework and criteria for allocating sites. It has been shown that there are no major constraints to development of the site.

5.3. The Dewsbury Riverside project will be the catalyst towards unlocking brownfield and derelict sites, delivering strategic highways infrastructure, regenerating Dewsbury Town Centre and delivering significant new housing. Regenerating Dewsbury Town Centre and Ravensthorpe and delivering new homes will deliver significant and transformational change and urban renaissance.

5.4. In accordance with the Framework Miller Homes has shown that the sustainable urban extension to the south of Dewsbury can deliver a mix of housing types and tenures and generate significant new benefits:

- Enable the regeneration and urban renaissance of Dewsbury and Ravensthorpe.
- Assisting in the provision of new strategic highways infrastructure.
- Create significant new job opportunities and economic growth in the area
- Create the critical mass to assist with enhancing Ravensthorpe Station and surrounding area.
- Create a high quality housing environment.
- There is the potential to accommodate a range of housing types and tenure, increasing choice and mix in the area and improving affordability.
- Delivery of new Community Hubs
- Delivery of landscape and environmental enhancements.
- Creating a robust and defensible urban edge and new Green Belt boundary

5.5. This targeted intervention will tackle the long standing issues such as overcrowding, community cohesion, social exclusion and deprivation.

5.6. The masterplan shows that the proposed scheme will radically change perceptions of the area through its green gateway and new neighbourhood and community facilities which will tie into the existing Ravensthorpe community.

- 5.7. Miller Homes are keen to deliver this significant opportunity which has substantial economic, social and environmental benefits for the local people and sub-region.
- 5.8. The aspiration for the creation of “an attractive riverside community, that is well served, linked to the surrounding countryside, enjoying easy access to the immediate opportunities in Dewsbury Town Centre and the wider City Region” set out in the North Kirklees Strategic Development Framework (2008) can finally be realised.