

## Statement Regarding Matter 1

Submitted by:

Kirklees Community Action Network

Document Version

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Q ref	<b>Matter 1 – Legal &amp; Procedural matters</b>
1.a	<p><b><u>Duty to co-operate with neighbouring authorities.</u></b> The Planning Inspector for the withdrawn LDF (Mr Roland Punsheon) emphasised in a public meeting in 2012 that <i>“co-operation is not simply about having friendly meetings with neighbouring authorities: there must be meaningful co-operation in both plan making AND plan implementation”</i>. Against that very clear definition, the Council has failed to cooperate in the context of:-</p> <ul style="list-style-type: none"><li>• Each Council in Leeds City Region, including Kirklees, has been excessively aspirational in its own Plan, to a point where the aggregate total of housing and industrial development, across the Region, is unrealistic in concept and undeliverable in practice.</li><li>• Following withdrawal of the previous LDF, mainly on the basis of lack of cooperation, the OAHN in this plan was increased to be “more consistent” with the Leeds City Core Strategy. However, after an SHMA review in 2017, Leeds City now propose to reduce their Core Strategy housing “targets” from 70,000 to under 55,000. Annual delivery is reduced even further, because the gross figures are to be delivered over a longer period. In order to maintain consistency with Leeds City, Kirklees should now reduce their housing targets (OAHN) by at least 23%, but have failed do so.</li><li>• Large scale green belt releases on both sides of the boundary between Calderdale and Kirklees, at Bradley Park, Bradley Wood, Clifton and Cooper Bridge, will effectively merge Brighouse, Huddersfield and Mirfield.</li><li>• Large scale green belt releases on both sides of the boundary between Leeds and Kirklees, at Morley, West Ardsley and Chidswell, will effectively merge Morley, Leeds, Dewsbury and Batley.</li><li>• Green belt releases for industrial development at Clayton West will compete with existing, unimplemented and better positioned industrial sites, adjacent to junctions 37, 38 and 39 of the M1 motorway in both Wakefield and Barnsley.</li></ul>

## Kirklees Local Plan Hearing Statement – Matter 1

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<b>1.a</b>	<b>Duty to Cooperate and obligations under the Habitats &amp; Species Regulations.</b> The plan shows
<b>1.c</b>	scant evidence of up-to-date and meaningful co-operation with the Peak Park Planning Authority, other South Pennine Local Authorities and environmental agencies in order to protect and enhance the two South Pennine SPAs [phases 1 and 2], the National Character Areas related to the SPAs or the impact assessment zones in the Upper Colne and Holme Valleys, which have a significant relationship with the landscape and habitats of the core SPAs.
<b>1.d</b>	<b>Public Consultation.</b> The Council has effectively “bulldozed” this plan through with little meaningful consultation. The plan claims that “A series of early engagement activities were undertaken to allow individuals to contribute to the vision”. <b><i>This is simply not true!!</i></b> One half-day workshop was held at the Media Centre in June 2014, involving a relatively small number of landowners, developers and members of the public. At the conclusion of the workshop, planners promised to hold follow-up workshops and provide other opportunities for input, but they never materialised. Since then, planners have refused to come out and meet residents groups, whilst every Council meeting involving the Local Plan has been heavily stage managed to constrain political opposition and public debate. Not least of the problems has been the inaccessibility, sheer volume, complexity and language of the documentation. It has been way beyond the capability of ordinary people to find and read the myriad of plan documents and supporting information, buried somewhere on the Council’s website, let alone understand what they mean in simple practical terms. The Council’s preferred “on-line” method for submitting formal consultation responses was also so heavily constrained and difficult to use that it seemed to have been purposely designed to dissuade ordinary members of the public from responding at all. At the same time there has been little or no provision made, in any of the stages, for people who do not have internet access. Quite simply the Council has contrived to “tick the public consultation box” without actually having any meaningful consultation whatsoever.