

## Statement Regarding Matter 2

Submitted by:

Kirklees Community Action Network

Document Version

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| Q<br>ref | <b>Matter 2 – Spatial Development Strategy</b>  |
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|          | <p><b>A vast gulf between “strategy” and “implementation”.</b> Much of the Vision and most of the aims, objectives, strategies and policies of the Local Plan are reasonably sound high level statements and can be supported (NB: Policy PLP6 is NOT supported). Unfortunately, in many areas of the plan, including the Spatial Development Strategy, there is an unacceptable and unexplained gulf between “strategy” &amp; “implementation”.</p>  |
| 2.a      | <p><b>Character Areas.</b> We applaud the recognition of “character” as a defining cornerstone of parts of the Local Plan. However we are extremely concerned that the four defined “character areas” or “Planning Districts” (the terms are not used consistently in the documents) are too large and not always sufficiently homogeneous to be used as “Planning Districts”. They also bear no relation to the “National Character Areas” defined by Natural England. For the concept of “character” to be effective, the Council needs to make sure that the description and composition of the planning area is accurate and homogeneous in planning terms – not just a convenient administrative sub division of the Council’s total area. AECOM, while working on the Holme Valley neighbourhood plan, identified 8 distinct character areas in the Holme Valley alone. We particularly advocate that the relatively small areas of the South Pennines National Character Area (NCA36) in the Upper Colne Valley and the Dark Peak National Character Area (NCA 51) in the Holme Valley should be recognised as discrete planning areas within the Local Plan, because of their distinctive planning requirements and strong relationship with the South Pennine &amp; Peak Park Special Protection Areas. We regret to say that the “uncomfortable” use of character areas in the plan is one example of the gulf between strategy and implementation.</p> |

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| 2.b | <p><b>Vision &amp; Strategic Objectives.</b> We feel that the Strategic Objectives are incomplete in some areas and very confusing in others. The Strategic Objectives should include clear strategic commitments to:</p> <ul style="list-style-type: none"> <li>• <b>Urban regeneration.</b> The plan does mention urban regeneration in Huddersfield and Dewsbury, but it is not currently a strategic objective. There is a general lack of hard, practical commitment to urban regeneration throughout the plan even though, in our view, POST-INDUSTRIAL URBAN REGENERATION IS THE SINGLE MOST IMPORTANT PLANNING ISSUE IN KIRKLEES TODAY. Urban Regeneration is the critical key to the future of Kirklees – NOT the amount of green field land available for development.</li> <li>• <b>Protection of the South Pennine moorland plateau and moorland fringe areas.</b> These areas are key defining characteristics of Kirklees as a whole and are a uniquely valuable leisure, tourism, economic and environmental resource for Councils on both sides of the Pennines. Recent Council surveys have shown that “environment” is one of the key attractors for business and is significantly more important than development land supply. Yet it is not recognised as such within the Council and within this plan.</li> <li>• <b>Community building.</b> The plan hardly mentions the negative impact that aspects of the plan, such as disproportionate urban extensions on green field sites, will have on local communities. We believe that reinforcing and building communities should be at the heart of any successful wellbeing strategy and ignoring it is a serious omission.</li> <li>• <b>Place shaping.</b> As the physical alter-ego of community building “place shaping” is a key role for Local Authorities. Yet place shaping, although included as a discussion topic in the document, is not a strategic objective(s) in the plan.</li> </ul> |
| 2.b | <p><b>Place Shaping:</b> The Plan discusses the issues related to place shaping at “District” level but the text is more a rambling summary of the status quo than an articulation of future direction. In particular it fails to set out a clear vision of the future for each of the “Planning Districts” and/or the many discrete &amp; diverse communities within those districts. Some of the defined Districts may be an appropriate level for “place shaping” but in others the District represents too coarse a level of granularity and the “place shaping” vision needs to be taken down to a more detailed level. The bottom line is that the plan does not really answer the central questions of “What sort of PLACES we want to live in?” and “What sort of COMMUNITIES we want to build?” The future vision needs to be set out clearly in the plan – at a level that makes sense for that particular community.</p>  |
| 2.c | <p><b>Meeting OAHN.</b> We have been quite clear in all our previous submissions that we do not support the concept of a 15 year, fixed OAHN, especially when the OAHN is based on highly contentious theoretical statistics and “dark art” manipulation. It is quite simply impossible to plan in any detail, 15 years ahead, especially when the impact of major issues such as Brexit, are as yet unknown. We would prefer to see a 15 year vision &amp; strategy, supported by a rolling 5 year flexible implementation programme, where housing needs and site allocations can be constantly reviewed, managed and adjusted, up or down. We have seen no evidence that:</p> <ul style="list-style-type: none"> <li>• The Council has given proper consideration to this more practical, flexible alternative.</li> <li>• The Council has considered whether the amount of functionally important Green Belt and statutorily protected land in Kirklees would provide grounds for reducing the Objectively Assessed Housing Need.</li> <li>• The Council has considered whether a stronger focus on master-planned urban regeneration would deliver OAHN in a more sustainable way.</li> </ul>   |

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| 2.d | <p><b>Homes - Housing Distribution.</b> The Spatial development Strategy says that the “largest amount of [new] development [will be] located in Huddersfield and Dewsbury”. Yet the Plan also says that Huddersfield will accommodate approximately 7,000 new dwellings and Dewsbury 5,000, meaning that the two towns will collectively accommodate just 38.5% of the total new development – hardly the “largest amount”. The housing allocations therefore clearly do not match the Spatial Development Strategy. If new development is not going to be concentrated in Huddersfield and Dewsbury, where is it going to be concentrated? Sadly there appears to be a disproportionate level of site allocations within the Kirklees Rural District. This also conflicts with the Spatial Strategy which advocates that most of the new development should be in the urban areas. NB: We regret to say this is yet another example of the huge gulf in this Local Plan between “strategy” and “implementation”.</p> <p>Quite simply the Council has been less than transparent in its Spatial Development Strategy about the proposed distribution of new housing throughout Kirklees and the balance between brownfield, green field and green belt development. It has been less transparent in the current version of the plan than it was in previous versions and significantly less transparent than it was with the now defunct LDF.</p> <p>NB: We have consistently argued that new housing development, in the form of master-planned urban regeneration, should be focused on the larger urban areas of Huddersfield, Dewsbury, Batley and Spen. Sadly the argument does not appear to have been taken on board.</p> |
| 2.e | <p><b>Settlement Sustainability</b> We have seen no evidence that the Council have considered settlement sustainability anywhere in the plan but especially in the site allocations.</p>  |