

KIRKLEES LOCAL PLAN EXAMINATION  
STAGE 1 – MATTERS, ISSUES AND QUESTIONS:  
MATTER 2

**SITE ID:** H1796

**REPRESENTING:** Priory Asset Management LLP

**SITE:** Land north and east of Laverhills and Quaker Lane, Hightown

## **RESPONSE TO MATTER 2: SPATIAL DEVELOPMENT STRATEGY**

**Issue – Does the overall growth and spatial strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?**

- 1.1 **Issue 2b** queries whether the Plan's Vision and Place Shaping Character provides a clear framework for the future growth and development of different sub-areas of the borough? On this point, we respond that the sub-areas are not based on housing market areas, or a settlement hierarchy, and there is a significant lack of detail explaining how the sub areas relate to the distribution of development. The approach adopted by the Council seems flawed given there is no evidenced link between the sub-areas and the distribution of development. Whilst major settlements should continue to play a key role in the accommodation of future development within the borough, this should not be at the expense of meeting the needs of the smaller settlements.
- 1.2 **Issue 2c** asks what other spatial distribution options were considered when determining how the Local Plan will meet the Council's Objectively Assessed Need? In preparing the draft Local Plan, the Council identified several options within their early engagement document, titled 'Kirklees the Place to Grow'. Within this document three options are detailed; the first comprised a settlement hierarchy approach; the second was based on place shaping/ character; and the third was a combination of the two. Although our client supports the use of a hybrid approach it is not considered that the selected option takes sufficient account of settlement hierarchy. In only considering three options the Council has severely limited the approach to planning for the future of the Borough. We would expect a minimum of 5 or 6 different options to have been considered for comparison purposes, and consulted upon, in order to identify the option which best suits the characteristics of the borough.
- 1.3 **Issue 2e** queries what the Council's spatial development strategy is for other parts of Kirklees and how place-making principles have been balanced against settlement sustainability? To this we respond that the Council have not balanced the place making principles against sustainability as the Council have failed to group the settlements into sustainable and lesser sustainable settlements, below the level of Huddersfield and Dewsbury.

- 1.4 The lack of a settlement hierarchy could result in development in settlements which do not have the infrastructure and services to accommodate the level of growth required. It could also result in the decline of services and amenities within settlements which fundamentally require development to maintain and enhance the vitality and viability of those areas. The Policy, as currently drafted, does not accord with the principles of sustainable development established within the Framework, or the approach advocated within Paragraph 55 of the Framework which seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability.
- 1.5 In the context of a plan led system, it is essential that the needs of all of the sustainable settlements across the borough, including those which are more rural in nature, are assessed and meaningful growth is apportioned to them. This will ensure development is focused within the most sustainable locations. It is respectfully suggested that the Council are failing to plan sustainably by not producing a hierarchy for the Borough which identifies several tiers of settlement.

**Hourigan Connolly**

**31 August 2017**