

## **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?**

### **Policies PLP 2 and 3**

Question a):- Are the boundaries of the sub areas , as established in the Place Shaping chapter, appropriately defined?

- 2.1 I consider that the sub area boundaries are appropriately defined and are reflective of the geographical characteristics of this large and varied metropolitan districts. There is a good case however for illustrating the adjacent areas of adjoining districts especially where the inter-active relationships are strong in terms of socio-economic relationships, infrastructure linkages and other matters.

Question b):- Does the Plan's Vision and Place Shaping Chapter provide a clear framework for the future growth and development of different sub areas of the borough?

- 2.2 In addressing this question it is important to review the issues scheduled in the earlier section of the Plan. Issue 12 :- "How should the relative economic strength of Kirklees and its inclusion within the LCR and part of the Northern Powerhouse be taken into account in determining where and how development needs are to be met." The introductory response states that the opportunity exists to transform the economy in the northern parts of the District with the strong links to Leeds/Bradford both geographically and in terms of proximity to the M62 and linking motorways.

Issue 15 asks how the potential for growth in manufacturing can be realised.

- 2.3 The Vision and Place Shaping Chapter do not provide a sufficiently clear framework for future investment decisions particularly in relation to economic development and infrastructure. It is not clear what the distribution of employment and housing development is between the sub areas especially in North Kirklees in terms of the close relationship between Batley and Spen and the Dewsbury growth area. There also needs to be more recognition of the close relationship between the adjoining areas of the Leeds and Bradford Districts in relation to the location of growth in North Kirklees.

Question c):- The Plan seeks to fully meet the objectively assessed employment and housing needs for the district and proposes an urban focus with some release of land from the Green Belt . What alternative strategies were appraised and why were they discounted.

- 2.4 The evidence for the appraisal of alternative strategies from key evidence base documents should be provided as a summary statement in the Plan text for clarity and certainty.

MATTER 2 :- SPATIAL DEVELOPMENT STRATEGY – KIRKLEES LOCAL PLAN EXAMINATION  
REPRESENTATIONS ON BEHALF OF SCHOFIELD AND PASK BY CLIVE A BROOK FRTP I RE OMMITTED  
SITE REF E2700 – LAND TO THE WEST OF BRADFORD ROAD AND SOUTH OF SYKES LANE  
OAKENSHAW.

Question d):- Paragraph 2 of the Spatial Development Strategy (page 36 in the Plan ) seeks to focus ‘most growth’ in the urban areas of Huddersfield and Dewsbury . Is this strategy and distribution clearly defined, justified and sustainable? To what extent will it be achieved?

- 2.5 The Strategy and distribution is not clearly defined at present. The extent of the growth via regeneration and other means in and around Dewsbury is not fully justified by the available evidence. The level of growth anticipated in the plan period is extremely challenging and there are very significant constraints to be overcome. The selection of Dewsbury as the second main growth focus in the District does not have the justification which supports the level of proposed growth in Huddersfield. The level of growth proposed at Dewsbury is most unlikely to be achieved within the Plan period.

Question e):- What is the Council’s spatial development strategy for other parts of Kirklees? Is the strategy and distribution of growth clearly defined in the Plan and justified? How have place-making principles (an areas character, constraints and opportunities) been balanced against settlement sustainability?

- 2.6 Again clearer definition in the Plan will assist investment decisions. Given the concerns on the achievement of the level of growth at Dewsbury there is a case for transferring some of this to the adjacent Batley and Spen sub area.

Question g):- Does the Spatial Development Strategy in the Plan provide a clear framework in respect of retail and office development?

- 2.7 It is not clear what the location principles for office development are and where provision is to be concentrated. While there is good scope for further office development in Huddersfield centre this is not the case with Dewsbury. There is a good case for a limited number of out of centre ( no more than 3) small to medium sized business parks to support the types of office and R&D facilities which do not seek town/city centre locations and which will assist the growth of advance manufacturing and distribution development.

Question h):- Should the Council’s spatial development strategy as set out on pages 36 and 37 of the plan be expressed as policy?

- 2.8 Yes this would be very helpful and supporting text could be added to further aid clarification and linkages to the remaining policies of the Plan.

Question i) Does policy PLP 3 provide a clear framework on locational requirements, in line with paragraph 154 in the NPPF? Does the policy give sufficient recognition to the protection of the Green Belt and the countryside? How will the development of brownfield sites be realised early in the Plan, as set out in criterion 2c?

- 2.9 Further elaboration and clarity is required to meet the requirements of paragraph 154 of the NPPF . The requirements stated are somewhat generalised and do not provide clear policy guidance. There appears to be no recognition of how Green Belt and countryside protection are to be achieved. Any attempt to prioritise the development of brownfield sites via some form of phasing policy would be contrary to the policy in the NPPF which

Evidence by Clive A Brook to the Kirklees local plan examination Matter 3 Spatial Development Strategy.

MATTER 2 :- SPATIAL DEVELOPMENT STRATEGY – KIRKLEES LOCAL PLAN EXAMINATION  
REPRESENTATIONS ON BEHALF OF SCHOFIELD AND PASK BY CLIVE A BROOK FRTPI RE OMMITTED  
SITE REF E2700 – LAND TO THE WEST OF BRADFORD ROAD AND SOUTH OF SYKES LANE  
OAKENSHAW.

seeks encouragement of brownfield development rather than prioritisation. Past phasing policies have created delivery problems.

PAGE 2