

## Matter 2 - Spatial Development Strategy

a) and b) The Plan does not adequately propose a spatial strategy or vision for the area. The 'Spatial Development Strategy' describes a **quantity** of proposed development, saying nothing about how new development will enable the overall pattern of settlement to become more sustainable, for example by reducing the need for road-based journeys for goods and people, or improving air quality. It undermines urban regeneration and revitalisation of town centres and fails to address the challenges of climate change. As such, the Plan's *Vision and Place Shaping* Chapter cannot be considered to provide a clear framework for the future growth and development of different sub-areas of the Borough.

c) CPRE maintain that the plan as proposed is unsound in respect of the issues raised above. We have raised concerns about the housing and employment assumptions, including the unrealistic OAN, the focus on edge-of-town, motorway-junction based development, inadequate justification for Green Belt changes, and related shortcomings in the Duty to Cooperate, it is clear that there are alternative strategies that have not been considered. The alternatives that have been considered are simply based on even less realistic growth scenarios, and less sustainable spatial patterns, that would inevitably be discounted.

d) and e) It is disingenuous to state that 'most growth' is focused on the main urban areas. As we outlined in our Core Evidence Paper, the spatial strategy is characterised by motorway-based employment allocations and a relatively dispersed pattern of housing allocations. The proposed developments risk the coalescence of Dewsbury (Chidswell) with East Ardsley, and Huddersfield with Brighouse; and a disproportionate scale of growth in a number of smaller settlements.

j) The plans growth and spatial development strategy with its focus on large strategic sites, removed from Green Belt, places an emphasis on new locations with disproportionately large infrastructure requirements. These sites are mostly near motorway junctions and will be reliant on road use for goods, services and people mobility. This will have a significantly negative impact on air quality and carbon emissions. Regeneration schemes lack an urban vision which has sustainability in terms of reducing carbon emissions at its core. There is also no overarching vision for reducing carbon emissions across the plan.