

## 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, 3**

#### **Questions**

- 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?*
- 1 No. The Plan does not take account of the distinct differences between the settlements so fails to take advantage of how these differences could be used positively.
- c) *The Plan seeks to fully meet the objectively assessed employment and housing needs for the district, and proposes an urban focus with some releases of land from the Green Belt. What alternative strategies were appraised, and why were they discounted?*
- 1 No. The employment needs of the district were not assessed objectively or transparently. We consider the process was fundamentally flawed which makes it unrealistic and unrealisable. The proposals are old fashioned and do not take account of the way in which the economy, particularly the rural economy, characterised as it is by greater numbers of the self-employed and micro businesses, could be used to create more local employment opportunities without making additional demands for site allocation.
- 2 We also feel constrained by the lack of information about brownfield sites. We note that Kirklees does not have a brown field site register and believe that better local consultation would have enabled more informed decision making.
- d) *Paragraph 2 of the spatial development strategy (page 36 in the Plan) seeks to focus 'most growth' in the main urban areas of Huddersfield and Dewsbury. Is this strategy and distribution clearly defined, justified and sustainable? To what extent will it be achieved?*
- 1 We fully support this policy but believe that the land allocation proposals in the plan do not support this.
- 2 In our view, far greater use of mixed developments should be made across Kirklees in the settlements where housing and economic activity has already taken place (as is traditional for this area). This would increase land supply and density, using brownfield site to reduce the need for travel and

commuting and by attracting smaller and lower cost houses would meet the needs of local people better.

- 3 Perhaps more importantly, such an approach would make a positive contribution to the renewal of those urban areas much in the need of regeneration which would be of benefit to all residents and the overall economy and wellbeing of the area. It should be remembered that Huddersfield suffers from low wages and has areas of significant need.
- 4 The current proposals for the Valley seem more aimed at attracting those likely to commute to and from nearby conurbations and spend in them rather than contributing to the local community.

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 area's character, constraints and opportunities) been balanced against settlement sustainability?*

- 1 We are frustrated by the lack of proper discussion on these alternatives and consider local knowledge can make a valuable contribution to an objective assessment of alternatives.
- 2 We can detect no clear vision for the distinct areas and settlements and there appears to be no or very little appreciation of life in small rural and semi-rural settlements. For example, accessibility is about more than bus services.
- 3 Even though "Place" is referred to in the Plan the way in which the allocation of land will affect the nature of a place and impact it will have on the strength of community feeling has not been taken into account. Disproportionate growth of settlements will erode the quality of life and destroy the very features that make the place attractive.

g) *Does the spatial development strategy in the Plan provide a clear framework in respect of retail and office development?*

- 1 As noted above, we doubt the validity of the Economic Strategy and in particular it contains no appreciation of the changes in employment and the nature of work.
- 2 There is a distinct failure to recognise the importance and value of tourism (Holmfirth is an internationally known brand) to the wider economy. While the Economic Strategy mentions the strengths of the Holme Valley it is unable to articulate them.

h) *Should the Council's spatial development strategy, as set out on pages 36 and 37 of the Plan, be expressed as a policy?*

- 1 The strategy set out on pages 36 and 37 is aspirational but flawed and fails to recognise the massive potential of economic growth that could take place in the Rural parts of Kirklees.

- 2 The focus on land-based economic development misses the opportunities of e-commerce.
- 3 Concentrating on the M1 and M62 neglects the closeness of Manchester and Sheffield;
- 4 The narrow focus on engineering and manufacture ignores the potential of culture, media, services and tourism.
- 5 A 75% employment rate is not realisable. Kirklees has not achieved this since June 2006. The Council is unable to provide a realistic basis for setting this target other than to say it is an aspiration. In our view, it is an aspiration to fail.
- 6 The Economic Strategy was not subjected to a proper consultation process and has not been approved by the full Council. To say that it is work in progress demonstrates that a fixed 15 year land allocation plan cannot be based on such a poorly researched document.
- 7 The separation of housing and employment sites will only add to traffic volume and will not contribute to carbon reduction or deal with the growing matter of air pollution. Even though the latter has been raised as a problem, there appear to be few if any constructive proposals to address it.
- 8 The use of green field land is not sustainable. Land is not being made any more! We would argue that the Plan should concentrate development in urban areas, using mixed developments at a higher density. This in our view would respond better to the housing needs of people who already live here. We recognise that there is a need for smaller, lower cost properties for those wishing to start in the property market and those wishing to down size (for whatever reason) and would applaud action to deliver these.
- 9 We can see no relationship between land allocation for housing and the areas where local population growth is most likely to occur. We cannot see how, given the local population distribution, significant natural population increase will occur in the rural areas and question why Kirklees has not taken a more nuanced approach to the allocation of land for new houses.
- 10 We consider that while expensive larger houses with high council tax bands may attract people in, those people may not necessarily work or spend here.
- 11 We are of the view that smaller lower cost housing is required to enable young people to remain in the Valley. These need to be coupled with employment opportunities and other accessible services and facilities. They will also allow older people and those experiencing life style changes to down size thus freeing up larger properties for those wishing to move into the area.

*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?*

1 The words may be in the Plan but we have no confidence in Kirklees' ability to deliver it as there is evidently a failure to understand the distinctive characteristics of the different settlements and places and its flawed unapproved economic strategy.

*j) What effect will the Plan's growth and spatial development strategy have on air quality and carbon emissions?*

1 We believe the proposals will make matters worse.