



Kirklees Local Plan Examination

Stage 1 – Initial Hearings

Hearing Statement

**Submitted on behalf of Chidswell
Action Group**

**Matter 2 - Spatial Development
Strategy**

September 2017

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. Chidswell Action Group have already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, the Chidswell Action Group wish to make the following additional comments in relation to the specific Questions raised by the Inspector. The Chidswell Action Group may also wish to speak at the hearing in relation to Matter 2.
2. Matter 2 – question (a)
 - 2.1 Dewsbury and Mirfield are placed together within one sub-area. However, this does not appear to split the area up sufficiently. The Dewsbury and Mirfield sub-area is very diverse and has a very diverse profile in terms of accessibility, local services, population, household income, unemployment etc. For example site MX1905 is classes as being within Dewsbury but it has very different characteristics to central Dewsbury. The Inspector will be able to see this when she carries out her site visits.
 - 2.2 The Chidswell Action Group supports the regeneration of Dewsbury. However, the Chidswell Action Group do not see how the development of sites such as MX1905, which is approximately 2miles from Dewsbury town centre, could possibly contribute to such a regeneration. Nor can it be classed as being part of the urban focused development of Dewsbury.
3. Matter 2 – question (c)
 - 3.1 The Local Plan in line with the NPPF purports to promote a brownfield first approach. However, the proposed allocations within the Local Plan do not seem to promote this approach.
 - 3.2 The release of large areas of Green Belt for development, such as MX1905, cannot be justified until all urban/brownfield sites have been fully explored.
 - 3.3 The Chidswell Action Group do not consider that the identified housing and employment needs are based on objectively assessed development requirements. They are based on theoretical projections and interpretations which not reliable.
 - 3.4 There is an over estimation of objectively assessed housing and employment needs; an under estimation of the brownfield land supply; an over estimation of the necessity for green field land allocation; and an over estimation of the necessary green belt land release.

- 3.5 The Local Plan is aspirational but not realistic. The objectively assessed housing target represents a 500% increase on actual completion rates in Kirklees since 2013. This is unrealistic and cannot be delivered.
- 3.6 The Local Plan claims to have an urban focus but, it seeks to allocate large areas of Green Belt land. The most confusing statement within the Local Plan is paragraph 6.36 which states:
- “Whilst the majority of local plan housing and employment allocations are therefore on greenfield sites, the Council remains committed to a brownfield first approach as set out in the policy.”
- 3.7 How can the Council remain committed to a brownfield first approach and then promote greenfield development ahead of brownfield sites? There are a number of sustainable brownfield sites not being taken forward as part of the Local Plan and it is not clear why. These sites should be considered ahead of any greenfield sites.
- 3.8 The Chidswell Action Group believe that there are brownfield sites which can accommodate the proposed level of development and this needs to be fully explored.
- 3.9 The Chidswell Action Group support the urban focus but the Local Plan does not actually deliver on this.
- 3.10 Proposed allocation MX1905 is said to be within the urban area of Dewsbury. However, the reality is that a large part of this site is 2 miles from Dewsbury Town Centre and is within the Green Belt. Not urban in any way!
- 3.11 How many of the proposed allocations which are said to be urban are actually far removed from urban areas? The Council need to clearly demonstrate that all sites classed as urban are in fact within urban areas.
- 3.12 Sites which are far removed from urban areas, such as site MX1905, will do nothing to regenerate urban areas and cannot be described as promoting an urban area first approach.
- 3.13 Many of the proposed allocations do not reflect the urban focus which the Council are purporting to promote through the Local Plan.
- 3.14 Any release of large green belt sites cannot be justified until all urban and brownfield sites have been fully explored.
4. Matter 2 – question (d)
- 4.1 Paragraph 2 of the Spatial Development Strategy seeks to focus most of the growth in the main urban areas of Huddersfield and Dewsbury. However, this is not what in fact is being promoted in reality.

- 4.2 For example 1, 535 dwellings and 122,500 sq.m. of employment uses are proposed at Shaw Cross/Woodkirk (MX1905). This site may be located within the broad Dewsbury area but it far removed from Dewsbury being approximately 2miles from Dewsbury town centre and it is Green Belt not urban in any way.
- 4.3 The Chidswell Action Group are supportive of the regeneration of Dewsbury but sites which are far removed from Dewsbury town centre will not assist with the regeneration of Dewsbury and cannot be classed as being within Dewsbury when they are approximately 2 miles from the town centre.
- 4.4 Therefore, the Council's intention to focus the most growth in Dewsbury and Huddersfield, the main urban areas, is not quite what it seems.
- 4.5 Green Belt sites a number of miles from the town centres, such as MX1905, are not sustainable or justified and are not urban focused developments.
5. Matter 2 – question (i)
- 5.1 The proposed allocation of large areas of Green Belt is not an appropriate strategy. The Chidswell Action Group supports a brownfield first approach and the effective use of all available brownfield sites should be encouraged.
- 5.2 The Chidswell Action Group do not consider that all brownfield options have been fully explored.
- 5.3 In the event that once a proper assessment of brownfield sites had been concluded there is a need for green field sites to be developed then the Local Plan must ensure that the brownfield sites are released first. Only once brownfield allocations have been developed should green field allocations come forward.
- 5.4 Any green field allocations should be allocated for later in the plan period to make it clear that brownfield allocations should be exhausted before the green field sites are considered.
- 5.5 The brownfield first approach is not sufficiently established within the Local Plan and there are no measures to ensure that it is implemented in this way. It is not appropriate to have all the allocations set out from the start of the Plan Period as this would allow development of green field sites ahead of brownfield sites which is against the Local Plans strategy.
- 5.6 If the Council can show that green field sites are required then these sites should be allocated as Safeguarded land to allow the Council to promote the brownfield first approach to development.