

22<sup>nd</sup> January 2018

**MATTER 26**

Statement on behalf of Kirkheaton Future (The Neighbourhood Plan Steering Group for Kirkheaton) regarding General Matters (26-29) of the Kirklees Local Plan Examination

I am a Chartered member of the RTPI and have held the Chair of Planning at various U.K. Universities, including Liverpool, Leeds and Dundee. I have 47 years of practice experience, including roles with U.K. Central and Local Government. In this work on Spatial Strategy and Housing I have been supported by specialist consultants appointed under DCLG arrangements.

This statement is made in order to clarify and exemplify the stance of Kirkheaton Future, through the draft Kirkheaton Neighbourhood Plan, to the role of site-related matters in the processes of place shaping and the subsequent development of settlements. It also comments on the document produced by Kirklees Council 'Additional Evidence (EX 38) relating to the distribution of growth between settlements' published in December 2017, but only made available to me on 18.01.2018.

Three points need to be made in relation to the general matters outlined by the inspector:

1. The questions related to Matter 26 ignore the most important question – and one not answered either in the statement made by Kirklees Council in their 'Additional Evidence' (EX38) document of December 2017 – that is: how does the desire of the Local Plan to adopt a place-shaping approach translate into policy at the individual settlement level? The response provided by Kirklees Council in EX38 and elsewhere in the case of Kirkheaton is not evidenced by reference to the clearly expressed central Guiding Principles of the draft

Kirkheaton Neighbourhood Plan (which is in conformity with the Kirklees Local Plan Policy PLP2 that argues that place shaping is essential “to protect and enhance the qualities which contribute to the character of place”). Two of the key Guiding Principles (supported by an overwhelming majority of Kirkheaton residents and businesses in a 100 percent survey of all properties) are that the village should be retained as far as possible within the existing built-up area and that the supply of land for housing and other built uses should come from brownfield land and small sites whenever possible. Work undertaken by specialist consultants and a total land use survey have demonstrated the validity of these Guiding Principles. This argument will form the basis of Kirkheaton Future’s objection to the designation of sites H737 and H3350 for possible future housing development. The proposal from Kirkheaton Future is that these sites should be removed from the list of potential housing sites and that replacement sites be added through the Neighbourhood Plan; such small sites would fully compensate for the loss of the capacity currently assigned to sites H737 and H3350. Detailed evidence on why the current draft designations are inappropriate is given in the statements made on each of these sites.

2. With regard to question 26-C, it is considered that the statements made in both the draft Local Plan and the December 2017 ‘Additional Evidence’ document do not clearly and adequately consider the site constraints and mitigation measures associated with individual settlements. Kirkheaton Future fully supports Kirklees Council in its desire to establish place-shaping as a key foundation for the Local Plan, but this desirable objective needs to be carried through to the level of individual settlements. This is not achieved in either the draft Local Plan or the inadequate and inaccurate brief description of Kirkheaton given in the ‘Additional Evidence’ document. Indeed, the paucity of evidence provided to support the unsubstantiated statements made in support of the justification presented for the designation of housing land fly in the face of the detailed evidence which is available (to which Kirklees Council has access), the overwhelming views of residents and businesses (see

above in (1) for reference to the General Principles) and the views of specialist consultants.

There are other options for development which are much more closely aligned to the draft Local Plan's Policy PLP2, to the clearly established evidence base, to the overwhelming preferences of Kirkheaton residents and businesses, and to the established national policies that set-out the purposes and content of Neighbourhood Plans.

3. In addition to the points made above, there is also a concern that the draft Local Plan fails to incorporate the available evidence on features of environmental and historic importance which relate to Kirkheaton. Question 26-R asks for modifications and these can be provided, including the implications at site level of the policy in the draft Kirkheaton Neighbourhood Plan which seeks to protect remnant historic routeways, areas of ecological significance and important landscape features.

In summary this statement of evidence supports the importance of the Draft Local Plan's stance on spatial development strategy and place-shaping. The draft Kirkheaton Neighbourhood Plan supports this stance and it also supports the provision of an adequate supply of land for housing, employment and other purposes. However, it also emphasises the need to allow the process of place-shaping to be expressed in the form of comprehensive and coherent policy at settlement level through the Neighbourhood Plan.