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MATTERS 30 & 31 - Sites H737, H3350 & H216

Statement on behalf of Kirkheaton Future (The Neighbourhood Plan Steering Group for Kirkheaton) regarding General Matters (30 & 31) 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 provide more detailed and recent evidence than that contained in the draft Kirklees Local Plan regarding a number of sites proposed for housing development. It also provides contextual details of the place-shaping requirements of an individual settlement and the implications of this in terms of the draft Neighbourhood Plan policies. In doing this it should be emphasised that Kirkheaton Future acknowledges the need for additional housing provision in the village and is dedicated to the delivery of a total number of housing units equivalent to the amount indicated as required in the draft Local Plan; the key difference between the draft Local Plan spatial allocation process and that used to draft Neighbourhood Plan policies, is in the quality, validity and up-to-dateness of the evidence employed. This is not intended to suggest that the draft Local Plan is invalid in general terms, but rather to reflect national guidance on the role performed by a Neighbourhood Plan developed in conformity with an approved Local Plan.

Three sites are considered herein:

1. Site H737

This site is outwith the existing built up area of Kirkheaton and therefore is not in conformity with a key Neighbourhood Plan Guiding Principle - "To retain the development of the village within the boundaries of the existing built-up area as far as possible". The proposed site is entirely outwith the existing built-up area; is set in an area of considerable ecological value; is a site that is difficult and costly to deliver for its intended housing purpose; is at the edge of Green Belt and, if developed, would totally alter the skyline and therefore represent a major visual intrusion into the Green Belt; is heavily constrained by grossly inadequate road access and an absence of other services; is adjacent to an historic remnant routeway (a green road that can be traced back to Medieval origins); and is a site that has been identified in the draft Neighbourhood Plan as having potential to provide recreation and amenity uses for the village. The removal of this site from the draft Local Plan list of proposed designations can be more than compensated for by the designation of available, well serviced and more easily developed smaller sites within the boundaries of the existing built-up area. In addition, there is a genuine concern that H737 would represent an unjustified and unwelcome intrusion into open countryside that would present a salient of urbanisation that would invite unacceptable "rounding-off" in the future.

2. Site H3350

This site is also outwith the existing built-up area of the village, has poor access and represents an intrusion into the Green Belt. Given the absence of detailed proposals regarding access, the designation of the site has to be questioned at this stage. If designated as part of the Local Plan, it would be subject to the sequential test policy

contained in the draft Neighbourhood Plan, which seeks to prioritise the use of brown field sites and small sites within the village boundary and only to use sites such as H3350 when all other options to deliver an agreed target number of housing units have been exhausted. This sequential test could also be applied to site H737.

3. Site H216

The development of this site is strongly supported - Kirkheaton Future previously supported an outline planning application for this site and would do so again. The issues related to this site are ones of capacity and access. In terms of capacity the draft Local Plan fails to make best use of the site and the estimated numbers of housing units indicated by the plan (48 dwellings) should be increased to over 60; this adjustment is supported by independent consultant reviews. In terms of access, the present constrained and potentially dangerous site access proposed by the developers should be set aside in favour of a one-way system which would add value to the site itself and contribute to the safety and welfare of the village.

As can be deduced from the above observations, the draft Neighbourhood Plan for Kirkheaton is generally in conformity with the Draft Local Plan, differing only in those cases which reflect the limited resources and time available to produce sufficient detail upon which to base the Local Plan. As set out in national policy guidance, the Neighbourhood Plan can provide this detail and, as such, has a major role to play in delivering housing, employment and other land allocations that are justified, effective and deliverable. In addition, it is argued that the proposed minor alterations to the draft Local Plan policy contained herein would enhance the sustainable development potential of the Local Plan (and the associated Neighbourhood Plan) in accord with the principle of Net Environmental Gain.