

Our ref: General/40b – Planning Conformity/Final responses/Kirklees Core Strategy Preferred Options

19 July 2006

Kirklees Talkback
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Dear Sir/Madam

Kirklees Core Strategy: Preferred Options Consultation June 2006

Thank you for consulting the Yorkshire and Humber Assembly on the Kirklees Core Strategy: Preferred Options. We must apologise for the lack of any comments from the Assembly on the Core Strategy: Issues and Options consultation published in October 2005. This was due to a severe lack of resources at the Assembly during a time when the preparation of the Regional Spatial Strategy was at a critical stage.

The Yorkshire and Humber Assembly now welcomes the opportunity to comment on the Core Strategy: Preferred Options and to continue its involvement in the development of a coherent spatial planning framework in West Yorkshire. The comments offered in this letter are intended to be within this spirit of continued and productive joint working.

As you know, the Planning and Compulsory Purchase Act 2004 introduced mechanisms to help ensure that Development Plan Documents (DPDs) drawn up by local authorities as part of their Local Development Framework are in general conformity with the Regional Spatial Strategy (RSS). The intention is to ensure that DPDs are contributing to the delivery of the RSS and that the two strands of the Development Plan for an area (the RSS and DPDs) are mutually supportive and not in conflict.

We think it would be helpful if this need for general conformity were set out at the start of the Core Strategy as this demonstrates the need for a stronger link between the LDF and the RSS than the current reference to the RSS setting out "guidance to be followed in the preparation of LDFs" (paragraph 2.2 on page 7).

At this stage, the Assembly's response to the consultation document is a set of officer comments. The aim is to highlight where issues related to general conformity with the RSS might arise. When the Core Strategy is submitted to the Secretary of State a formal Assembly view on its general conformity with the Regional Spatial Strategy will need to be given.

The following officer comments are made in relation to the existing Regional Spatial Strategy for Yorkshire & the Humber (based on the selective review of RPG12 issued in December 2004) and the Draft Regional Spatial Strategy – the Yorkshire and Humber Plan (submitted to the Secretary of State in December 2005). The comments place emphasis on draft RSS, which reinforces and develops the general thrust of existing RSS; furthermore it is more up to date and has significant "weight" in its own right. The weight attached to the draft RSS will increase as it passes through its Public Examination (September and October 2006) and once the Panel's Report is received (expected Summer 2007) before it is issued by the Secretary of State (expected late 2007).

Regional Spatial Strategy

Notwithstanding the need to highlight the general conformity relationship between the RSS and the LDF, the summary of draft RSS on pages 7 and 8 is welcomed. It correctly sets out the housing requirements and the indication of employment land needs contained in draft RSS. Early on in the Core Strategy it might be helpful to expand a little on this summary of RSS to set out its spatial objectives, Core Policies YH1 to YH9 and sub-area approach. This might help to place the policies and priorities that affect the Kirklees District from the RSS within their wider regional and sub-regional context.

Strategic Objectives and Spatial Vision

There is clearly a strong link between the spatial vision and the strategic objectives that are set out in the Core Strategy. It is perhaps surprising that 'minimising the need to travel' and 'maximising the use of energy efficient transport' are not explicitly listed as objectives, as this would help to reinforce the need for the main urban areas to be the focus of development and for good public transport links to be provided. We would also suggest that it is important to make it clear in relation to objectives 1, 2 and 3 that the land and facilities located in the most sustainable locations will be prioritised (what these locations are is then clearly the subject of the options put forward later in the document).

Within the spatial vision (page 15), it would be helpful to make it clear how this settlement strategy relates to the Core Policies of the RSS and its identification of Huddersfield as a Sub-Regional Centre and Dewsbury, Batley and Holmfirth as Principal Service Centres. Point 2 of the Spatial Vision states that job opportunities will be provided in the towns and larger villages in South Kirklees "for those unable to travel to larger towns for employment". We would suggest that the need to provide good local employment opportunities should not be restricted to those "unable" to travel as this may be taken as accepting a level of unsustainable travel by others. Could this point be changed to emphasise that there will be support for more diverse local employment opportunities in order to reduce the need to travel?

Spatial Options

Notwithstanding the preceding comments, the Assembly is broadly content with the Spatial Vision and Strategic Objectives of the Core Strategy as these suggest that the Core Strategy would support a spatial pattern of development that would help to implement the RSS. This is particularly the case in relation to the focus on the main urban areas, the meeting of local needs in other urban areas, the meeting of a range of environmental objectives and the emphasis that is placed on accessibility of services and provision of public transport.

We are therefore surprised that some of the Spatial Options presented would, by your own evaluation (summarised on pages 39 to 41), severely undermine the achievement of this vision and objectives (ie Options A, C, D and E). Equally, whilst we understand that new housing is the main development that will take place in the District, we feel that taking a housing-led approach to the options might overlook the need to consider the role of settlements more broadly, with an assessment of their economic, social and environmental needs and opportunities underpinning the settlement strategy. The RSS suggests that this more 'holistic' approach might be helpful and, indeed, uses the sub-area approach to explore what this might mean for the planning of different parts of the region. At present, if such an approach has underpinned the identification of the different spatial options of the Core Strategy, it does not come through strongly in this document. Equally, some of the options (such as C and E) would challenge some of the fundamental locational principles set out in existing and draft RSS (such as prioritising the reuse of previously developed land) and would therefore not support its implementation.

Leeds City Region and South Dewsbury

Given the identification of the Leeds City Region sub-area and the related policies set out in the draft RSS, the Assembly would wish to see more emphasis placed in the Kirklees Core Strategy on the potential role of Dewsbury and how it could develop. There are likely to be different ways in which the Core Strategy could implement Policies LCR1 and LCR2 of Draft RSS and we would hope that this could be considered as part of the Core Strategy preparation process. However, there is little coverage of how the regeneration, remodelling and growth of South Dewsbury is to be taken forward through any of the options.

At this stage, there were perhaps four key elements of the regional strategy that we hoped would be considered in regard to South Dewsbury through the LDF process: the need for quantitative and qualitative change in housing stock; the desire to see its economic function developed to complement Leeds; and for this to be driven forward as soon as possible. Whilst the South Dewsbury housing growth area is identified on all of the Spatial Options maps, the implications of this is not explicitly drawn out or accounted for in any of the options.

Bearing in mind the comments made above, the following are some brief detailed comments on each of the spatial options set out in the document.

Option A

This option appears to represent one of concentration of development depending on the location of brownfield sites. However, it does not appear to take account of what might be the respective roles of the settlements in the District and does not differentiate between them and apportion growth accordingly through identifying a settlement hierarchy.

Option B

Like Option A, this does not appear to take account of what might be the respective roles of the settlements in the District and does not differentiate between them and apportion growth accordingly through identifying a settlement hierarchy. Draft RSS supports the provision of planned urban extensions if these are necessary in the light of local capacity assessments (see Policy YH8 B).

Option C

This suggests a highly concentrated approach that doesn't seem to attach importance to the contributions that the District's centres other than Huddersfield (ie the Principal Service Centres and Local Service Centres identified in the Draft RSS as important parts of the settlement hierarchy) can make to the sub-region. The Draft RSS emphasises the need for development to meet local needs and it is not clear that this is provided for in this spatial option.

Option D

This option focuses development in North Kirklees and may be seen as consistent with the role for South Dewsbury identified in the Draft RSS. However, it does not utilise the potential of Huddersfield as an important sub-regional centre which is an equally important element of Draft RSS that needs to be reflected in the Core Strategy.

Option E

This option seems to ignore the locational principles set out in existing and draft RSS and would not address the development potential or need for development in the sub-regional centre of Huddersfield and other principal and local service centres. It would also not help to deliver the growth and redevelopment of South Dewsbury. An increase in car-based commuting would seem an almost inevitable consequence of this spatial option.

The Sustainability Appraisal Report illustrates some of the negative impacts that could arise from the proposed options, notably Options D and E. In addition to the need for general conformity with the RSS, we would therefore suggest at this stage that a 'hybrid' option be developed. This should support a spatial strategy and pattern of development that recognises the roles of the different settlements and the need for concentration in the most sustainable locations as well as the proposals for the growth of South Dewsbury. This would most likely develop from a combination of Options A, B and C.

Core Policies

The proposed Core Policies generally reflect the Regional Spatial Strategy and are therefore to be welcomed. Some detailed points are set out below.

Housing and Employment policies

Whilst the need to regenerate and support investment is clear and is strongly supported, it would be helpful if the proposed policies H2 and E1 acknowledged the ways in which the different centres across the District currently have different roles, needs and opportunities. These differences mean that the approach to regeneration and investment will need to vary depending on the sustainability of the settlement or neighbourhood in question. The LDF can play a major role in identifying these differences and in suggesting an appropriate strategy in response.

Land for employment (page 51)

With regard to land for employment, draft RSS requires that sufficient land is available in sustainable locations to meet the needs of a modern economy. It states in Policy E3 that the pattern and scale of provision of land should be determined by local employment land reviews (informed by Policies E1 and E2), taking account of the land forecasts in table 14.6 and 14.7 of draft RSS unless more detailed local forecasts are available. The three Regional Econometric Model scenarios used to inform draft RSS suggest that the change in total employment land in use in Kirklees may range between 0 and 43 hectares.

The Kirklees Core Strategy consultation paper proposes land provision based primarily on past take-up rates with additions for four suggested needs. We would suggest that the LDF should be underpinned by a thorough analysis guided by the ODPM Employment Land Review Guidance Note December 2004. The projection (with adjustments) as used in the consultation paper results in a total land provision and an annual take-up rate approximately three times higher than the top of the range suggested in draft RSS, without specific cross reference to evidence from an up to date employment land review. We note the point that is made about reductions in employment not providing suitable sites for new or expanding employers but no reference is made to the potential for deallocating sites in unsustainable locations. We would be pleased to liaise over this issue further as you prepare your submission draft Core Strategy.

In conclusion, we feel that the consultation paper raises many important matters and highlights issues that do need careful consideration. We appreciate that preparing options for debate can be difficult and can result in what might be seen as 'extreme' scenarios being published. Perhaps the debate over these options will help to broaden the understanding of what constitutes a sustainable settlement pattern.

I hope that these comments are helpful to you. Clearly we wish to see the Core Strategy developing in general conformity with the Regional Spatial Strategy and I would be happy to discuss the points we raise here further if it would help this process.

Please do not hesitate to get in touch if anything is not clear. We look forward to working with you further on your Core Strategy.

Regards



Jenny Poxon
Head of Planning Delivery and Conformity

cc Patrick Auterson, Planning Policy Manager, Kirklees Metropolitan Council