

Comments

Event: Kirklees Local Plan Scoping Consultation

Consultee Name: Akhtar

Consultation point: Scoping Consultation

Question 1 - Evidence

The evidence base is substantial and covers many of the right areas, but I do not believe it is yet sufficiently complete or current to support the decisions that will follow on the spatial strategy and site allocations. A particular concern is open space evidence. The Strategic Environmental Assessment currently relies on the Council's 2016 Open Space Assessment, while also confirming that a new Open Space Study is being developed. The SEA identifies significant differences between individual wards. For example, Batley East is identified as having the greatest deficiency in parks and recreation grounds of any Kirklees ward, with only 0.29 hectares per 1,000 population against a benchmark of 0.8 hectares. The SEA also identifies Batley East as deficient in natural and semi natural space. The SEA itself states that these findings are subject to change when the new study is completed. This matters because national planning policy says planning policies should be based on robust and up to date assessments of open space need, including quantitative and qualitative deficits and opportunities for new provision. I therefore believe the new Open Space Study should be published and incorporated into the evidence base before decisions are made on the spatial strategy and site allocations. It should retain sufficient town and ward level detail to prevent district wide or sub area averages masking significant local deficiencies. More broadly, the evidence base should provide a clear assessment of infrastructure capacity, including transport, schools, healthcare, drainage and sewer capacity, utilities, green infrastructure and community facilities. This should consider the cumulative impact of planned growth across an area, rather than assessing individual sites in isolation. I would also like to see a clear delivery assessment of the 2019 Local Plan, identifying which significant housing, employment and infrastructure allocations were delivered, which were not, and the reasons for non delivery. That evidence should inform decisions about the deliverability of future allocations. Finally, the underlying baseline data should be quality assured. As one example, the SEA records Batley East's population as 19,189 in 2011 and 18,904 in 2021, but records the change as +285. The figures indicate a reduction of 285. This may be a simple typographical error, but accurate local evidence will become increasingly important as policies and sites are assessed. The evidence base is therefore a strong starting point, but important evidence still needs to be updated, tested and brought together before the Plan moves from identifying issues to deciding where growth should take place.

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No

Question 2 - Previous early engagement priorities

The priorities identified through the earlier engagement remain broadly the right priorities for Kirklees. They reflect important concerns around housing, protecting green space, town centres, employment and the economy, transport, climate resilience and infrastructure. However, the next stage should turn these broad priorities into clearer place based and measurable outcomes. Kirklees is a diverse district and district wide priorities can mask significant differences between individual towns, wards and communities. I would particularly strengthen the emphasis on infrastructure keeping pace with development, regeneration of existing town centres, access to employment, better transport connectivity,

affordable and appropriate housing, and good quality green and recreational space. There should also be a stronger focus on delivery and learning from the existing Local Plan. Many of these issues are not new. Where previous housing, employment, infrastructure or regeneration ambitions have not delivered as expected, the new Local Plan should understand why and use those lessons when developing its policies and future allocations. Finally, these priorities should translate into outcomes that can be measured at a meaningful local level. Residents should ultimately be able to see not only what Kirklees wants to achieve by 2043, but what improvement should actually look like in their own town or neighbourhood. The priorities are broadly right. The next challenge is turning them into measurable improvements for individual places rather than simply district wide ambitions.

Please Select

Yes

Question 3: Strengths, weaknesses, opportunities and threats

The SWOT identifies many of the right issues and opportunities, but I believe it needs a stronger place based assessment of inequality within Kirklees. Kirklees is not one uniform place. District wide and even sub area averages can conceal significant differences between individual towns and wards. The Local Plan should identify where communities have poorer access to infrastructure, employment opportunities, transport, green space and recreational facilities, and treat reducing those inequalities as a strategic issue. Batley East provides a clear example. The Council's own Strategic Environmental Assessment identifies Batley East as having the greatest deficiency in parks and recreation grounds of any ward in Kirklees, with provision of only 0.29 hectares per 1,000 residents against a benchmark of 0.8 hectares. It is also identified as deficient in natural and semi natural green space. Importantly, the wider Batley and Spen area appears comparatively well provided for in parks and recreation largely because of Oakwell Hall Country Park. This demonstrates how wider geographical averages can mask significant inequalities within individual communities. I therefore believe the SWOT should distinguish more clearly between district wide issues and significant place specific weaknesses and opportunities. This is important because the SWOT will help inform the spatial strategy, policies and ultimately decisions about where future development should take place. There is also an opportunity to give greater recognition to Batley's strategic position, including its railway station, town centre regeneration, employment areas, TransPennine connectivity and relationship with the wider West Yorkshire economy. The Council's evidence also identifies the Dewsbury to Batley to Chidswell Sustainable Travel Corridor. These assets should be viewed as opportunities for regeneration and improved access to employment and services, rather than transport considerations in isolation. Finally, I would strengthen deliverability as both a weakness and a future risk. The review of the existing Local Plan identified problems with housing and employment supply and delivery. The new Plan should understand why previous allocations or ambitions did not progress as expected and ensure that future growth proposals are realistic and supported by the infrastructure necessary to deliver them. A stronger place based SWOT would provide a better foundation for the next stages of the Local Plan and help ensure that growth to 2043 reduces existing inequalities rather than reinforcing them.

Please Select

No

Question 4: Local issues and policies

I believe there are several issues where stronger local or geographically targeted policies would be useful, particularly where the evidence demonstrates an existing deficiency or infrastructure constraint. Green and recreational space is one of them. As highlighted in my response to Question 3, the Council's own evidence demonstrates significant geographical inequalities in provision. The Local Plan should establish how identified deficiencies will be reduced through protection and improvement of existing provision, new provision where appropriate, and contributions arising from development. Development in an area that is already underprovided should not simply maintain the existing deficit. Infrastructure alongside development also needs stronger policy protection. New housing and employment development should not be considered separately from the additional pressure placed on roads, public transport, schools, healthcare, drainage and sewer capacity, utilities, green space and community facilities. Local Plan policy should require infrastructure capacity and the cumulative impact of development to be considered early, with necessary improvements planned and delivered alongside growth. Town centre regeneration and the reuse of existing buildings should also receive strong policy support. Batley has an established town centre, significant industrial and architectural heritage, a railway station and opportunities to reuse vacant or underused buildings and previously developed land. Policy should encourage appropriate reuse and regeneration while protecting important heritage and local character. Transport and regeneration should be considered together at a place level. Batley's railway station, town centre, residential communities and employment areas should form part of a coherent approach to connectivity. Future transport investment should improve access to employment, services and the town centre, rather than being considered as a separate transport issue. More broadly, where the evidence demonstrates a significant local deficiency or opportunity, the Local Plan should be capable of responding through geographically targeted policies, rather than relying entirely on district wide standards. The principle should be straightforward. New development should leave an area better served than it was before, particularly where an existing deficiency has already been identified.

Please Select

Yes

Question 5: Vision

I broadly agree with the proposed vision. It contains the right ambitions around housing, economic growth, regeneration, transport, climate resilience, healthier communities and protection of the natural and historic environment. However, I would strengthen the vision by making reducing geographical inequality within Kirklees a more explicit ambition. By 2043, success should not only be measured by growth across the district as a whole. It should also be measured by whether the gap between communities has narrowed, particularly in access to infrastructure, employment opportunities, transport, green and recreational space and essential services. I would also strengthen the relationship between growth and infrastructure. The vision should make clear that infrastructure will be planned alongside development and that the location and scale of growth will take account of existing capacity and cumulative pressures. Communities should not have to wait years for infrastructure to catch up with development. The vision should also give greater recognition to the distinct identities and potential of individual towns. Batley, for example, should have a clearer ambition connecting its town centre, railway station, employment base, heritage, housing, regeneration and transport opportunities. A place based vision would help ensure that growth responds to the different needs and opportunities of

Kirklees' communities rather than applying a single district wide approach. Finally, I would strengthen the commitment to delivery and measurable improvement. The existing Local Plan already identified many challenges that remain relevant today. The new vision should therefore provide a clearer basis for measuring whether those challenges have actually been addressed over the Plan period. By 2043, residents should be able to see not only how Kirklees has grown, but how their own communities have improved because of that growth.

Please Select

Yes

Question 6: Vision

The vision broadly reflects the main issues and opportunities facing Kirklees. It recognises housing need, economic growth, regeneration, transport, climate resilience, health and wellbeing, green infrastructure and protection of the natural and historic environment. However, I believe the vision needs to connect these issues more clearly. Growth, infrastructure and inequality should not be treated as separate considerations. Where development takes place, the Local Plan should consider existing infrastructure capacity, existing inequalities and whether that growth can help address them. There is also a significant opportunity to connect transport investment with regeneration and access to opportunity. Investment in rail, bus, walking and cycling should not be viewed simply as transport provision. It should help people access employment, education, services and town centres and support the regeneration of established places such as Batley. I would also give greater prominence to deliverability. The review of the existing Local Plan identified difficulties with housing and employment supply and delivery. The new vision should reflect what has been learned from that experience and ensure that future ambitions are realistic, supported by infrastructure and capable of being delivered. Finally, the vision should recognise that success will look different across Kirklees. The same district wide improvement can have very different effects in communities starting from different positions. The Plan should therefore combine district wide ambitions with place based outcomes and monitoring. Overall, the main issues and opportunities are present. The improvement I would make is to connect them more clearly around place, infrastructure, inequality and delivery, so that future growth produces measurable improvements for existing communities as well as accommodating new development.

Please select

Yes

Question 7: Vision

I support the principle of focusing growth on sustainable settlements, making effective use of existing buildings and brownfield land, and locating development where there is good access to services, employment and public transport. However, at this scoping stage I do not believe sufficient evidence has yet been presented to conclude that the right places for future growth have been identified. The choice of growth locations should consider much more than the availability of land. Infrastructure capacity, existing inequalities, access to employment, schools and healthcare, transport capacity, green space provision, flood risk, viability and the cumulative impact of development across an area should all influence where growth is directed. Batley should be considered carefully within the future growth strategy. It is an established town with a railway station, employment areas, town centre regeneration opportunities and connections into the wider West Yorkshire economy.

However, growth in Batley should not simply mean allocating additional housing. It should contribute to regeneration, improve connectivity and help address existing infrastructure and environmental deficiencies. As the Plan progresses, the eventual spatial strategy should be supported by clear evidence demonstrating why particular settlements and sites have been selected, why reasonable alternatives have not been selected, whether the proposed growth is deliverable, and what infrastructure will be required to support it. I would therefore expect the next stage of the Local Plan to show transparently how each proposed growth location performs against infrastructure capacity, accessibility, environmental constraints, regeneration opportunities, existing inequalities and cumulative development pressures. The principle should be growth in the right places, supported by the right infrastructure, with a clear benefit to the communities already living there.

Please Select

No

Question 8: Vision

Batley should receive greater attention within the vision, with particular consideration given to Batley East. Batley is one of Kirklees' principal towns, with a distinctive industrial and architectural heritage, an established town centre, railway station, employment areas and strong connections into the wider West Yorkshire economy. The vision should provide a clearer picture of what Batley is expected to become by 2043 and better connect planning for its town centre, railway station, employment, housing, heritage, regeneration and transport. Greater attention should not automatically mean greater levels of development. It should mean a clearer ambition for the town and a stronger relationship between growth, regeneration and investment. Batley East requires particular attention in relation to green and recreational infrastructure. As set out in my response to Question 3, the Council's own evidence identifies a significant deficiency in provision. This is especially important because the wider Batley and Spen area can appear comparatively well provided when considered as a whole, largely because of Oakwell Hall Country Park. Wider averages should not be allowed to conceal deficiencies experienced by individual communities. Existing green and recreational spaces in areas already experiencing deficiencies should therefore be strongly protected, while future development and infrastructure investment should be used to increase and improve provision rather than preserve the existing deficit. Batley's built heritage and local character also deserve greater attention. Regeneration should encourage the productive reuse of vacant and underused buildings and brownfield land while protecting the buildings, townscape and heritage assets that give Batley its distinct identity. I would also like the vision to recognise Batley's strategic connectivity as an opportunity. The railway station, TransPennine connections, wider public transport investment and links to employment should be used to strengthen the relationship between the town centre, surrounding communities and the wider West Yorkshire economy. By 2043, Batley should not simply have accommodated its share of Kirklees' growth. It should be demonstrably a better connected, greener, more prosperous and stronger town because of it.

Please Select

Yes

Question 9: Vision

The vision sets out the right broad direction, but I do not believe it yet gives a sufficiently clear picture of what Kirklees should actually be like by 2043. The ambitions around

economic growth, housing, regeneration, sustainable transport, healthier communities, climate resilience and protection of the environment are positive. However, a long term vision should go further than describing desirable outcomes. It should give residents a clearer understanding of what will actually have changed. By 2043, will geographical inequalities between communities have reduced? Will residents have better access to employment and reliable public transport? Will town centres be stronger and more economically active? Will communities currently experiencing infrastructure or green space deficiencies have better provision? Will infrastructure have kept pace with housing and employment growth? The vision should also give a clearer picture for the individual towns and communities that make up Kirklees. A district wide vision is important, but Huddersfield, Dewsbury, Batley and the smaller towns and rural communities have different starting points, challenges and opportunities. Batley in 2043 should have an identifiable ambition reflecting its town centre, railway station, employment base, heritage, regeneration opportunities and connectivity. I would therefore strengthen the vision by including a small number of measurable, place based outcomes, supported by baseline information and monitored throughout the life of the Local Plan. This would allow residents and decision makers to see whether inequalities are narrowing, infrastructure is improving, regeneration is succeeding and communities are benefiting from growth. By 2043, residents should be able to see not only how much Kirklees has grown, but how their own communities have improved because of that growth.

Please Select

No

Question 10: Objectives

The proposed objectives broadly cover the right areas, including economic growth, reducing inequality, housing, town centres, transport, health and wellbeing, green infrastructure, climate resilience, heritage and making effective use of previously developed land. I would, however, strengthen the objective on inequality so that it explicitly addresses geographical inequality between different parts of Kirklees. As highlighted elsewhere in my response, communities do not start from the same position. The Local Plan should therefore aim not simply to improve Kirklees overall, but to reduce significant disparities in access to infrastructure, green space, recreation, transport, employment and other opportunities. I strongly support the specific objective to strengthen the town centres of Huddersfield, Dewsbury and Batley. For this to be meaningful, the Plan should establish clear place based outcomes for each town, recognising their different challenges, assets and opportunities. The objectives relating to housing and growth should also make a stronger connection with infrastructure capacity and cumulative impact. New development should be supported by the transport, education, healthcare, drainage, utilities, green space and community infrastructure necessary for both new and existing residents. The combined impact of multiple developments on the same infrastructure should also be considered. I support the emphasis on regeneration, previously developed land and making effective use of existing buildings. This is particularly important for established towns, where development can contribute to regeneration while protecting local character and reducing unnecessary pressure on undeveloped land. Finally, the objectives should ultimately be supported by measurable indicators and, where appropriate, place based targets. This would allow the Council and residents to assess whether inequalities are reducing, town centres are improving, infrastructure is keeping pace with growth and communities are genuinely benefiting from development. The objectives are therefore broadly right. The key is ensuring they become measurable commitments that influence decisions about growth, investment and infrastructure, rather than remaining broad aspirations.

Please Select

Yes

Question 11: Services, facilities and infrastructure

Infrastructure should be treated as an integral part of the spatial strategy, not something considered after development has already been allocated. Priorities should include sufficient road and junction capacity, reliable public transport, schools, primary and community healthcare, drainage and sewer capacity, flood resilience, utilities, digital connectivity, parks and recreation facilities, and safe and practical walking and cycling infrastructure. Importantly, infrastructure planning should consider the cumulative impact of growth, not simply individual developments in isolation. Several developments may each appear manageable when assessed separately but collectively place substantial additional pressure on the same roads, schools, health services, drainage systems, public transport and recreational facilities. Their combined impact should therefore influence site selection, infrastructure requirements and the timing and phasing of development. Infrastructure capacity should also be considered before significant growth locations are allocated. Where existing capacity is insufficient, the Local Plan should identify what improvements are required and demonstrate that they are realistically capable of being delivered. For Batley, transport connectivity deserves particular attention. The railway station, bus network, town centre, employment areas and residential communities should be considered together. Future transport investment should improve access to employment, education, services and the town centre, as well as accommodate additional development. Green and recreational infrastructure is equally important. As identified elsewhere in my response, some communities already experience significant deficiencies. Future development in those areas should contribute towards reducing existing deficiencies as well as meeting the additional needs generated by new development. Otherwise growth risks increasing an inequality that already exists. Health and education capacity should similarly be assessed alongside future housing requirements. Flood risk, drainage, sewer capacity, utilities and digital infrastructure should influence both the location and scale of development rather than being addressed late in the planning process. For significant growth locations and allocations, I would expect a clear Infrastructure Delivery Plan setting out what infrastructure is required, when it is required, how it will be funded, who is responsible for delivering it and how delivery will be monitored. Where essential infrastructure cannot realistically be delivered, that should be a material consideration when deciding whether the scale or location of growth is appropriate. Infrastructure should lead or accompany growth, not spend years catching up with it.

Question 12: Future Engagement

Future Local Plan consultations and updates should use a combination of direct email, the Council website, social media, councillor briefings and face to face engagement within individual towns and communities. Engagement should be place based as well as Kirklees wide. As proposals become more detailed, particularly when the spatial strategy, infrastructure requirements and potential development sites are published, residents should be clearly shown what is being considered in their own area and given an opportunity to influence proposals early enough for their views to make a difference. Ward councillors should receive advance briefings and clear local information, including maps and relevant evidence, so that we can properly inform residents and encourage participation through established community networks. The Council should also actively engage community organisations, businesses, schools, voluntary groups and other local networks rather than relying primarily on residents finding an online consultation themselves. I would particularly

welcome dedicated engagement sessions in Batley when the Draft Local Plan and potential site allocations are published. Residents should have the opportunity to speak directly with planning officers, see what is proposed on clear local maps and understand the evidence and reasoning behind those proposals. Consultation material should be written in accessible language and make greater use of maps and visual information. Where appropriate, information should also be available in formats and languages that enable communities across Kirklees to participate effectively. Most importantly, there needs to be a clear feedback loop. Following each consultation, the Council should publish what people said, the main issues raised, what changed as a result and, where representations did not result in change, why not. Engagement should be an ongoing conversation throughout preparation of the Local Plan rather than something concentrated around statutory consultation deadlines.

Question 13: Any other comments

My final comment is that the new Local Plan should be built on learning, accountability and delivery, as well as evidence. Kirklees is not starting from a blank sheet. The existing Local Plan, its subsequent review, previous public engagement and the evidence already assembled provide considerable knowledge about the district's challenges and opportunities. The new Plan should therefore demonstrate what has been learned from the previous Plan, particularly where housing, employment, infrastructure or regeneration ambitions did not deliver as expected. I would ask the Council to produce, as part of the next stage of Local Plan preparation, a clear 2019 Local Plan delivery and lessons learned assessment. This should identify which significant housing, employment and infrastructure allocations were delivered, which were not, and the principal reasons for non delivery. Those lessons should directly inform the spatial strategy and assessment of future allocations. Secondly, the next stage should demonstrate transparently the evidence and reasoning behind the spatial distribution of growth. Site availability alone should not determine where development goes. Infrastructure capacity, cumulative impact, regeneration opportunities, public transport and accessibility, existing inequalities, environmental constraints and deliverability should all form part of that assessment. The assessment should also explain why reasonable alternatives were rejected. Thirdly, significant growth locations and allocations should be subject to an infrastructure and cumulative impact test. Where several developments will rely upon the same roads, schools, health services, drainage systems, public transport or community facilities, their combined impact should be assessed. Where additional infrastructure is required, the Plan should identify what is needed, when it must be provided, how it will be funded and who is responsible for delivery. Fourthly, the Local Plan should establish measurable place based outcomes alongside district wide targets. Monitoring should allow residents and decision makers to determine whether infrastructure deficits are reducing, town centres are improving, access to employment and transport is increasing, environmental deficiencies are being addressed and geographical inequalities are narrowing. The quality and currency of the evidence supporting these decisions will be critical. As identified earlier in my response, some current findings on open space rely upon the 2016 Open Space Assessment while a new Open Space Study is being prepared. The SEA itself acknowledges that the findings may change when that work is completed. Important decisions about the spatial strategy and site allocations should therefore use the most current evidence available. I would also ask the Council to quality assure its ward level baseline data. As one small but specific example, the SEA records Batley East's population as 19,189 in 2011 and 18,904 in 2021, but records the change as +285. Those figures represent a reduction of 285. This may simply be a typographical error, but accurate local data becomes increasingly important when that evidence is subsequently used to assess policies and development locations. Finally, the Local Plan should not ultimately be judged

simply by whether Kirklees accommodates the required number of homes or hectares of employment land. By 2043, the real test should be whether the communities that accommodated that growth became better places to live. If Kirklees reaches 2043 having delivered development while retaining the same infrastructure deficits and geographical inequalities identified today, we will have delivered growth, but we will not have delivered a successful Local Plan.