



Kirdford Parish Council
Matter 3 – The Spatial Strategy

ISSUE – Is the spatial strategy positively prepared, justified, effective, and consistent with national policy?

Policy S1 Spatial Development Strategy

Q13. What is the justification for the proposed distribution of development in the plan area?

KPC Response:

1. As set out throughout our representations, Kirdford is not an area that is well located to other uses and nor is it serviced by any choice of transport modes apart from the private automobile and a poor bus service.
2. The justification provided by CDC for the selected Spatial Strategy in relation to the North of the Plan Area (NAP) is difficult to follow and it fails to effectively justify CDC's decision to look to Kirdford for additional housing (50 dwellings). It states that "Conserving the rural character of the area, with its high quality landscape and environment is a key objective" yet this is not the actual Strategic Objective of the Local Plan.
3. KPC does not see where there is an identified need set out in evidence for additional housing need in Kirdford, especially considering the limited public transport available (explained in our Reg. 19 representations). Any additional housing will simply result in commuting to jobs outside of Kirdford. The local facilities do not need further support as this currently consists of a small village shop and two pubs. How does this Spatial Development Strategy comply with the Local Plan objectives and how is it based on actual evidence on the capacity of the village and the wider North of the Plan Area?

Q14. In assessing the transport impacts of housing growth, what reasonable alternative levels of housing growth were considered for the southern plan area and why were they discounted? (see also Matter 4A transport)

KPC Response:

4. KPC is not satisfied with the implications of the selected alternative for growth in the South Area of the Plan, which directly results in a higher level of growth in the North of the Plan Area, an area that is not well located to other uses and not serviced by another transport mode apart from private automobile and a poor bus service.
5. The justification provided for the selected growth in the Local Plan refers to the constraints on the A27 in the south of the plan area, and that a *“moderate level of growth in the north to help make up the overall shortfall of dwellings”*. However, it does not state what the *“constraints on the A27”* actually are and what other transport solutions are considered to address the A27 constraints. It does not explain what the *“overall shortfall of dwellings”* is due to the *“constraints on the A27”*. Therefore, it seems that the amount and location of development between north and south areas of the Local Plan are not sufficiently justified and the main issues for its determination (A27 concerns) are not clearly explained nor alternatives to address these issues sufficiently explored.
6. For instance, the alternatives explored in the Sustainability Appraisal included increased growth in areas like Southbourne, which *“could potentially give rise to reduced concerns - given the rail station, planned A259 cycle upgrades, a lack of direct access onto the A27, good road links to Portsmouth and the potential to masterplan with a focus on transport objectives”*, but had limitations in its deliverability in the plan period.
7. KPC is of the view that these options, where potential reduced concerns with regards the A27 and other transport solutions exist, such as access to mass public transport (bus and rail) as well as potential improved active travel routes, should be explored more exhaustively before offsetting development to the North of the Plan Area, which has no capacity in transport terms (amongst other constraints) for additional development.

Q.15 The final paragraph of the Policy says ‘To ensure that the council delivers its housing target, the distribution of development may need to be flexibly applied, within the overall context of seeking to ensure that the majority of new housing is developed in accordance with this Strategy where appropriate and consistent with other policies in this plan. Any changes to the distribution will be clearly evidenced and monitored through the Authority Monitoring Report’. What is meant by ‘flexibly applied’? Is the Policy clearly written and unambiguous, so it is evident how a decision maker should react to development proposals?

KPC Response:

8. The flexibility clause demonstrates a lack of robustness and confidence that the Council has in the Spatial Development Strategy and that it can and will be delivered in the plan period as planned. It also raises concerns with the effectiveness of the spatial strategy if the flexibility clause applies and how this clause would be interpreted by the Local Planning Authority in the decision-making stage. This clause could become a gap in the development plan, through which development non-compliant with the spatial strategy could circumvent the Local Plan and depart from unexplored and adopted scenarios, which could be catastrophic.
9. The term ‘flexibly applied’ is ambiguous and it could lead to a flexible interpretation of number of dwellings allocated to Kirdford Parish, which could result in an increased number of dwellings, for which Kirdford has no capacity, especially in consideration of existing uses, services and infrastructure.

Q.16 Are the proposed main modifications (MMs) necessary for soundness?

10. The proposed MMs are insufficient for a sound spatial development strategy policy. Policy S1 is perhaps the most important policy in the whole development plan and there are serious doubts about its robustness and ambiguity in its interpretation that have not been resolved by the proposed two minor changes to the policy text, which do not tackle the issue raised in question 15 above.

Policy S2 Settlement Hierarchy

Q.17 Is the proposed settlement hierarchy justified?

KPC Response:

11. The proposed settlement hierarchy (policy S2) is not justified, and it relies on evidence that is full of simplicities and weak arguments that do not reasonably support the settlement tiers proposed and in particular, the inclusion of Kirdford in the 'Service Villages' tier.
12. KPC already raised concerns with regards to the lack of justification of the settlement hierarchy in the Reg. 19 representations, which are summarised as follows:
 - a) There is no justification with any substance to explain of how the Council has arrived at the policy or hierarchy.
 - b) There is no definition in Policy S2 or supporting text of what each tier of the hierarchy means.
 - c) The Settlement Hierarchy Background Paper provides an overly simplistic methodology for assessing the services, facilities and roles of the settlements across the district. This background paper is flawed due to:
 - i. An overly simplistic approach, which provides no assessment of the accessibility or capacity of the facilities and nor does assess the distance or time required to access key facilities and services sustainably.
 - ii. Background Paper was prepared in 2018 and is using outdated information.
 - iii. Kirdford should not score any points according to the Council's own methodology, as there is no bus service on Wednesdays.
 - iv. The Background Paper acknowledges that the settlements considered 'Service Villages' *"vary in terms of access to facilities and services"* demonstrating that this variation of access needs much further investigation to arrive at a robust assessment.
13. This leads to conclude that the proposed settlement hierarchy is not based on robust evidence and a reasonable methodology, therefore lacking justification as currently proposed.

Q.19 Are the suggested MMs necessary for soundness?

KPC Response:

14. The MMs do not tackle the main issues raised above, therefore these are insufficient.