

Stage 3 Hearing Statement: Upper Dearne Valley Environmental Trust
Matter 15 – Infrastructure delivery

Issue – Does the Plan set out a robust framework for infrastructure delivery which is justified, effective and consistent with national policy?

**[Policies PLP 4 and 19
Sites TS 1 – TS 11]**

- a) Does the Council's Infrastructure Delivery Plan (IDP) (2015) and Addendum (2016) provide a thorough assessment of needs and costs, and reflect the levels of growth proposed in the Local Plan?

No – they completely ignore the role of the A635 and A636 which provide the major commuter and economic delivery route to and from the Holme and Dearne Valleys to M1 Jcts.38 and 39. There is no recognition of the vast amount of development – housing, commercial and quarrying-planned in the South Eastern side of Kirklees Rural.

Again, given the amount of development planned in the Dearne Valley is hard to reconcile the Council's forecast for school places. We would like to question further the basis on which these forecasts were made.

The Council appear to be in denial over the cumulative impact of their proposals on the infra-structure of our area.

- b) What transport modelling work has been undertaken, and has it taken account of: i) the potential impact on the local highway infrastructure outside Kirklees, and ii) cumulative effects arising from growth in other nearby local authorities?

No comment at this stage.

- c) How will the necessary highway capacity improvement schemes in the IDP be funded? (beyond those identified in Highways England's Road Investment Strategy)

No comment at this stage.

- d) Do Parts 1 and 2 of the Plan clearly identify essential infrastructure needed to deliver development? Are the transport improvement schemes listed in section 10.1 in Part 1 of the Plan and chapter 7 in Part 2 of the Plan justified by the Council's evidence base and internally consistent? Are the Council's proposed modifications SPMM18 – SPMM21 necessary to ensure that the Plan is sound?

The plan totally ignores the needs of the Dearne Valley area and wider needs within south eastern Kirklees Rural. With 1300 new houses (970 of which are in the first 4.5 yrs of the Phasing Plan), extended quarrying and commercial development of 16+ha within a 2 mile stretch of valley, no road improvements appear to have been identified. There is one main road that serves the whole area – the A636. This is a single carriageway road, the

capacity of which is often restricted due to constrictions in the road and parked vehicles. Schools, homes and businesses line the road through Clayton West, Scissett and Denby Dale. The B6116 is a 'high accident route' which in parts is barely 4m wide and severely constricted as it passes through Skelmanthorpe, Shelley and Kirkburton. We have estimated that this road is already working to its capacity at peak times.

Modifications SPMM18-SPMM21 appear to dilute requirements from the original wording. They are less precise and less effective in our view.

- e) Is the approach of seeking infrastructure delivery alongside development, as established in Policy PLP 4, justified and effective? What effect will this have on the phasing of development proposals?

We do not believe this policy is justified or will be effective. Following decades of under-investment in the local road network, there is a need have infrastructure before development. A piecemeal approach is likely to lead to yet more local disruption and increased likelihood that it will never happen. We believe this is a policy again designed to reduce costs to developers.

Currently, the phasing of development in the Dearne Valley is completely unrealistic, unachievable. The size and scale of proposals is likely to put the health and safety of the existing community at risk in our view – totally against the provisions of the NPPF. There appears to be no spatial strategy for Kirklees Rural or an assessment of the overall impact of development proposals – both are desperately needed in our view.

- f) Is there evidence that the scale of developer contributions, policy burdens and CIL rates will not render development unviable?

For us, the evidence is the current level of profits being reported by the large national housebuilders.