



Kirklees Local Plan Examination

Stage 1 – Initial Hearings

Hearing Statement

**Submitted on behalf of Save
Mirfield**

**Matter 2 - Spatial Development
Strategy**

September 2017

Matter 2 – Spatial development strategy

Issue – Does the overall growth and spatial strategy for the Plan present a positive framework which is consistent with national policy and will contribute to the achievement of sustainable development?

1. Save Mirfield have already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, Save Mirfield wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Save Mirfield also wish to speak at the hearing in relation to Matter 2.
2. Matter 2 – question (a)
 - 2.1 The Local Plan divides the area in to four sub-areas. However, Save Mirfield do not consider that these are appropriately defined.
 - 2.2 Mirfield is placed in to the same sub-area as Dewsbury. However, this area needs to be further sub-divided.
 - 2.3 Mirfield is very different from Dewsbury as the Inspector will see at the site visits. The two areas do not share the same planning issues at all.
 - 2.4 Save Mirfield therefore considers that the sub-areas need to be reconsidered.
3. Matter 2 – question (C)
 - 3.1 Save Mirfield do not consider that the identified housing needs are based on objectively assessed development requirements. They are based on theoretical projections and interpretations which not reliable.
 - 3.2 There is an over estimation of “objectively assessed housing needs”; an under estimation of the brownfield land supply; an over estimation of the necessity for green field land allocation; and an over estimation of the necessary green belt land release.
 - 3.3 The Local Plan is aspirational but not realistic. The objectively assessed housing target represents a 500% increase on actual completion rates in Kirklees since 2013. This is unrealistic and cannot be delivered.
 - 3.4 The Local Plan claims to have an urban focus but, it seeks to allocate large areas of Green Belt land.
 - 3.5 Save Mirfield believe that there are brownfield sites which can accommodate the proposed level of development and this needs to be fully explored.
 - 3.6 Save Mirfield support the urban focus but the Local Plan does not actually deliver on this.

- 3.7 Proposed allocation H2089 is said to be within the urban area of Dewsbury. However, the reality is that a large part of this site is 3 miles from Dewsbury Town Centre and is within the Green Belt. Not urban in any way!
- 3.8 How many of the proposed allocations which are said to be urban are actually far removed from urban areas? The Council need to clearly demonstrate that all sites classed as urban are in fact within urban areas.
- 3.9 Sites which are far removed from urban areas, such as site H2089, will do nothing to regenerate urban areas and cannot be described as promoting an urban area first approach.
- 3.10 Many of the proposed allocations do not reflect the urban focus which the Council are purporting to promote through the Local Plan.

4. Matter 2 – question (d)

- 4.1 Paragraph 2 of the Spatial Development Strategy seeks to focus most of the growth in the main urban areas of Huddersfield and Dewsbury. However, this is not what in fact is being promoted in reality.
- 4.2 This Local Plan promotes large allocations of sites which are far removed from Dewsbury or Huddersfield but which are being branded as being within these areas, such as site H2089 which in parts is 3miles from Dewsbury town centre.
- 4.3 Much of proposed allocation H2089, the so called “Dewsbury Riverside Development”, is not an urban area but Green Belt and the western part of the development is within Mirfield not Dewsbury.
- 4.4 This strategic allocation will therefore do nothing for the regeneration of Dewsbury and is not a Dewsbury focused development.
- 4.5 Sites such as H2089 are not in the right location to support the growth and innovation and there is insufficient infrastructure to support the development.
- 4.6 Save Mirfield are supportive of the regeneration of Dewsbury but sites which are far removed from Dewsbury town centre will not assist with the regeneration of Dewsbury and cannot be classed as being within Dewsbury when they are in parts 3 miles from the town centre.

5. Matter 2 – question (i)

- 5.1 The proposed allocation of large areas of Green Belt is not an appropriate strategy. Save Mirfield suggest a brownfield first approach and the effective use of all available brownfield sites should be encouraged.
- 5.2 Save Mirfield do not consider that all brownfield options have been fully explored.

- 5.3 Save Mirfield consider that if the Council were to look properly at the available brownfield sites they would find that the brownfield first approach which they purport to prescribe to could actually be achieved.
- 5.4 In the event that once a proper assessment of brownfield sites had been concluded there is a need for green field sites to be developed then the Local Plan must ensure that the brownfield sites are released first. Only once brownfield allocations have been developed should green field allocations come forward.
- 5.5 Any green field allocations should be allocated for later in the plan period to make it clear that brownfield allocations should be exhausted before the green field sites are considered.
- 5.6 The brownfield first approach is not sufficiently established within the Local Plan and there are no measures to ensure that it is implemented in this way. It is not appropriate to have all the allocations set out from the start of the Plan Period as this would allow development of green field sites ahead of brownfield sites which is against the Local Plans strategy.
- 5.7 If the Council can show that green field sites are required then these sites should be allocated as Safeguarded land to allow the Council to promote the brownfield first approach to development.
6. Matter 2 – question (j)
- 6.1 Mirfield is located in an area vulnerable to the accumulation of pollutants leading to poor air quality. Mirfield is trapped between three major roadways; the M62, A62 and the A644. The town is positioned between two areas of concern with regards to the monitoring of air quality. These areas are Scout Hill and the Bradley /Cooper Bridge Intersection.
- 6.2 In the Kirklees Council Air Quality Progress Report 2010/11 Mirfield is identified as being at risk from air pollution due to increased traffic and its location.
- 6.3 Two Air Quality Management Areas (AQMAs) have been declared in Kirklees by the council and these are as follows:
- Leeds Rd, Bradley Rd junction for the exceedance of the annual mean air quality objective (AQO) for NO₂.
 - Scout Hill, Dewsbury for the exceedance of the daily average AQO for small particulates (PM₁₀).
- 6.4 There are already severe existing traffic related issues in Ravensthorpe and Mirfield which would be made worse by the proposed allocation of more housing in this area. Traffic queues result in inevitable air pollution.

- 6.5 Para 3.10 in the strategies and Policies document states that “national and local policies are in place to protect and improve local air quality”. If they do indeed exist, these have not been widely communicated to local people on Air Quality.
- 6.6 The allocation of more housing in this area and inadequate infrastructure and mitigation measures proposed for the movement of traffic will inevitably lead to increased pollution and carbon emissions which will have a negative impact.
- 6.7 The health of the community will be affected by increased development, due to increased traffic and associated air pollution. Children and the elderly are most affected.