

## **KIRKLEES LOCAL PLAN EXAMINATION**

### **STAGE 4 HEARINGS**

#### **Matter 30 – Huddersfield Housing Allocations: Green Belt Releases**

**Issue – Are the proposed Green Belt release housing allocations in the Huddersfield Sub-Area justified, effective, developable/deliverable and in line with national policy?**

**H31: land north-west of Woodsome Drive, Fenay Bridge (68 dwellings)**

**H2684a: land adjacent Penistone Road/Woodsome Park, Lepton (286 dwellings)**

**H2730a: land to the south-east of Hermitage Park, Lepton (312 dwellings)**

This submission is by Cllr. Alison Munro (parish Councillor for Lepton Ward on Kirkburton Parish Council) on behalf of Almondbury Ward Liberal Democrats.

As a local representative my view is that the considered view of local residents should be taken into account in the Local Planning Process. I have been sent copies of the representations made by Green Action in Lepton (GAIL) at every stage in the process, and have spoken to many local residents. In November 2016 we circulated an online petition which gained 170 signatures from around 300 recipients. There is no doubt in my mind of the feelings of local residents, who oppose the scale of proposed developments in and around Lepton. I have read the current submission by GAIL carefully and consider it to be a well-reasoned set of objections within the scope of the current MIQs. There is no point in repeating their arguments in detail and my comments will be brief.

**30a) How do Sites H2730a and H2684a relate to each other? Should they be combined in a single text box/policy and a joint Masterplan required?**

I agree with the GAIL submission here and have nothing to add.

**30b) How does the proposed new roundabout at Penistone Road/Woodsome Road fit with the Indicative Masterplan for Rowley Lane (December 2016)? What are the implications for site phasing?**

I agree with the GAIL submission here and have nothing to add.

**30c) Is there sufficient provision to ensure that development on sites H2730a and H2684a does not cause unacceptable impacts on biodiversity and local habitats?**

I agree with the GAIL submission here and have nothing to add.

**30d) Has the impact of the proposal on heritage assets been adequately assessed and addressed? Should protection and mitigation measures linked to Heritage Impact Assessment (LE98) be specified in the Plan?**

I agree with the GAIL submission here and have nothing to add.

**30e) Are the sites available and deliverable in the timescales set out in the Council's housing trajectory?**

I agree with the GAll submission here.

**30f) What effect would the proposed boundary changes and allocations have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Lepton and Highburton be affected? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?**

It has often been hard to find the right time to make comments within the four stages of this process. In previous submissions I commented in general on the failure of Kirklees Planning Department to properly evaluate the sustainability of proposed developments in terms of transport and pressure on local infrastructure such as schools, doctors, dentists etc. These comments were largely based on the developments in the Lepton area where over 800 new houses will be added to a community of around 2400 houses (with addition of another 274 houses nearby on site 1679 in Fenay Bridge, listed in these MIQs). Now it seems that the current MIQs relate only to Green Belt sites in the area, and do not allow specific issues of sustainability in Lepton to be revisited. In the stage 3 process we stated:

“B: MIQ 20 Health and Supporting communities

(i) We submit that inadequate assessment has been made of the effects of aggregated developments within an area on access to GP, dental and nursery services, to schools, and on community and recreation facilities that may already be lacking. Lack of these facilities within a local area will lead to increased car journeys affecting MIQs 19, 20 and 23. Although we will submit site specific comments at stage 4, we believe that the failure to consider aggregated sites is a flaw in the plan as a whole”

This comment referred specifically to Lepton where the Planning Department had made no proper assessment of the impact of over 800 houses within the combined catchment areas of Rowley Lane J&I School and Lepton C. of E. School. In the sustainability appraisals for the final local plan in 2016, under “3. Ensure Education Facilities are available to all” Site 2684a and 2730a are rated blue, while site H31 is rated green ++. The commentary on these sites only addresses the distance to local schools and not whether places are available. New data for 2017 entry obtained from a local headteacher and the Kirklees website shows that the two schools took only a handful of pupils from outside the two PAAs. In previous years, while the schools were full, the data could have been interpreted as being undersubscribed within the PAAs. Since one of the schools was briefly in special measures recently, it is very likely that this trend will continue. These new data need to be addressed by Kirklees Planning, together with an assessment of the impact on other

local infrastructure.

From information supplied to us we understand that formerly the local Primary school has never had more than 50% intake from within its PAA (priority Admissions Area) with remaining places being filled with children who live in Lepton, but reside within the catchment of the C of E school in Lepton. This is due to the fact that this part of Lepton is more heavily populated.

The pattern with both schools filling all places firstly from the Lepton area, then further afield, such as Almondbury and Lascelles Hall has been the same for many years. However there has been a noticeable change and a gradual decrease in available places to children living outside the Lepton area. Data from Kirklees shows that in the last two years in the whole of Lepton combined there have been a total of 75 (2016-7) and 84 (2017-18) children eligible to start school. Both schools together have a combined capacity of 90 which leaves a small amount of capacity between the two schools combined for 2017/2018 of 6 places.

While the Education Authority stated a while ago that it expected the birth rate in the area to fall meaning that it would expect the local schools to be able to cope with any required intake over the next few years, this does not explain the increase in demand for school places within Lepton. We submit that it has failed to acknowledge the simple fact that areas with good schools, are more attractive to families who want their children to have a good education and many families will move into areas with good schools to make sure their children have the best education possible. This is evidenced by the gradual year on year decrease in availability of pupil places in Lepton.

(see Appendix 1).

Furthermore access to local schools in Lepton in the draft plan were given a green plus plus, for example H31. Importantly the only variable being assessed is the distance to school and not the capacity for places at the schools

Due to the gradual decrease year on year in availability of pupil places at both schools, it is clear that the developments for our area are unsustainable and will place an immense strain on our local schools

A similar approach was taken to transport infrastructure. If a site is near a bus route it gets a green rating for access to local employment centres and climate change. No assessment is made on the capacity of the transport network at rush hour. The reality is that with no train line and limited bus services the vast majority of the new residents will go to work by car. Giving these sites a green ++ rating on "19 climate change" is ridiculous.

The cumulative effect of these failures is to give these Green Belt sites "significant positive effects" in the majority of the 19 objectives. This is then used as part of the justification for taking these sites out of green belt.

To summarise, these sites are Green Belt, and as mentioned in the GAIL submission, the

presumption should be AGAINST development. A previous Inspector kept these sites within the Green Belt for good reasons. Kirklees have included these sites in the Local Plan purely because of pressure from developers: there is no objective reason to pick these sites over many other Green Belt sites in the Huddersfield area. At this point the cumulative effects on infrastructure of these developments and others in the area should have been used, instead of merely assessing how far each site is from a school or a bus stop.

We submit the plan is unsustainable, unsound and undeliverable in Lepton and Fenay Bridge.

Appendix 1

Table of Lepton Schools Admissions Data 2013 - 2017

C of E Capacity 30	2017	2016	2015	2014	2013
Out of Area no sibling	0	6	6	7	4
Unfilled places	0	4	0		
Maximum distance	2570	3077	2289	1683	2123
Rowley Lane capacity 60					
out of area no sibling	15	27	21	21	23
spare places	0	0			
max dist (m)	1963	2180	2348	1438	3822
apparent spare capacity	15	37	27	28	27