

**Kirklees Local Plan**

**Examination Stage 4 Hearings**

**Site Allocations Dewsbury and Mirfield Sub-Area**

**Matter 34**

**Vernon Property LLP**

1. **Issue**

Are the proposed Green Belt release housing and mixed use allocations in Dewsbury and Mirfield Sub-Area justified, effective, developable/deliverable and in line with National Policy.

**H2089 – Land south of Ravensthorpe Road/Lees Hall Road Dewsbury**

- a) **The Access Statement Technical Note (SS14) identifies a need for four access points into the site. What is the estimated dwelling capacity that could be served from each of these points? How is this capacity reflected in the phasing plan and housing trajectory? Has necessary third party land been secured?**

This is a question for the Applicant and Council but at present there is no information before the inquiry. This is a very significant site allocation. It cannot be approached in a piecemeal manner. A full EiA is required to accompany an application for the entire site. It is not appropriate to cherry pick initial phases. The site must be accompanied by a comprehensive masterplan which demonstrates entirely how the site can be brought forward and the environmental impacts on that scheme. Particularly having regard to the road network. At present, no such information is available.

It is not clear whether necessary third party land has been secured which places a considerable doubt upon the early delivery that is suggested by the Council and promoter.

- b) **The Technical Note and Delivery Framework identify the need for strategic highway intervention at about the 2000th dwelling, with one solution being the provision of a new bridge and strategic highway through the site.**
- i. **How would the new strategic road link into the scheme, and has a potential route been incorporated into the masterplanning work?**
- ii. **How would the strategic road link be funded, and what effect would it have on the viability of the development scheme?**

**iii. Are other potential options being investigated?**

Again no information is available to answer any of these questions which are highly pertinent to whether or not this is a sound allocation. The need, delivery and funding of the link road is essential. Potential options also need to be considered as part of an Environmental Impact Assessment. All of this will take a considerable amount of time which will impact significantly on the delivery of the scheme.

**c) At what stage would improvements to Ravensthorpe station be required? What would these improvements involve and how would they be delivered/funded?**

Again, this question is highly pertinent and we have not seen an answer to this question.

**d) Should the proposal clearly specify the number/location of access points required and highways/transport infrastructure requirements?**

We agree that the number and locations of access points is critical to whether or not this scheme is deliverable and indeed fundable.

**e) Does the Plan provide sufficient detail on other infrastructure requirements, including education, open space, allotments and provision of a Local Centre? Should the Plan specify the amount of land required for the provision of such facilities, along with details of timing/phasing? How and at what stage will provision be made for early years/childcare and secondary education facilities? What size/form of Local Centre was factored into the Viability Assessment?**

It is essential to understand how the education in particular can be delivered. The timing and phasing is critical and all of this is rightly questionable in terms of viability. We have significant doubt that this site would, in the long term be viable and there is a strong likelihood that small early phases would be cherry picked unless a very comprehensive Section 106 Agreement is put in place by the Council. All of this will take a considerable amount of time.

**f) Should the proposal provide clearer detail on mitigation required in association with biodiversity, including the retention of existing habitats? Has ecological and arboricultural survey work been completed?**

We have seen no evidence that such work has been completed and whether such basic surveys confirm that the impacts are acceptable.

- g) **Why does the Masterplan show residential development in southern sections of the site which are identified in the Landscape Framework Plan as ‘areas of development stand-off’ which are important for visual reasons?**

We agree that development in the southern sections of the site which are identified should not be included for development which would impact on the delivery rates.

- h) **Have constraints relating to air quality, noise, contamination and land stability been satisfactorily investigated and addressed? Are related mitigation measures and 4 requirements clearly expressed in the Plan? How have these constraints and measures impacted on the viability of the scheme?**

We have seen no information in relation to any of these matters and nor the impact upon the viability.

- i) **Is the indicative site capacity justified, having regard to landscape, environmental and other constraints and the provision of necessary infrastructure? How many dwellings are likely to be accommodated on land that is currently not within the Green Belt, both within the Plan period and over the whole development period? How many hectares will be required for development up to 2031 (2,310 houses)?**

We do not consider the indicative capacity is justified if only by reason that there is not sufficient evidence to consider this question one way or another.

- j) **The housing trajectory indicates that 710 dwellings will come forward within five years, with the first units delivered in 2018/19. Are the estimated delivery timescales reasonable and justified?**

***[the Council is requested to provide a detailed delivery programme which sets out phasing information relating to different parts of the sites and timings of key stages, including preparatory work, marketing/appointment of housebuilders/development companies, EIA work if necessary, Section 106 work, other legal and contract work, preparation of outline/full/other applications, planning application determination, discharge of conditions, site preparation, commencement of development. Anticipated timings of key infrastructure delivery should be provided as part of this programme.]***

We consider the delivery of the 710 dwellings within 5 years is grossly optimistic. The work required for EIA, Section 106 and disposal of parcels of land would, in our view, take at the very least 3 years.

- k) **What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Dewsbury and Thornhill be affected? Are there exceptional circumstances that justify altering the Green Belt? Is there evidence to demonstrate that the section of the site likely to come forward beyond 2031 would be justified and needed to meet housing requirements in the longer term?**

Once again, we accept there are exceptional circumstances that warrant deletions from Green Belt. We believe however that there are other sites which are more well contained and have less impact upon Green Belt. We also consider that a strategy which does not rely significantly on such sites is sound. The strategy which places all eggs in only 3 main baskets is not, in our view sound.