

I would like to submit the following comments and information as part of the Save Scholes Green Belt (SOSGB) residents group's objections to planning application 2022/62/92406/W

I, along with all members of SOSGB, **do not support building on the Old Quarry (Chippings site)** or any green belt site under any circumstances, whether for affordable houses or not, particularly when there are true brownfield sites available in the area (see below - Brownfield sites in Holmfirth). We fully believe that, in light of the current climate emergency we should be conserving as much green belt as we can! Green belt land like the Old Quarry (Chippings site) should be cleaned up and redeveloped as a true 'green space', such as a nature/wild flower area, which will not only help the environment but be a space that the local community can use and enjoy.

In regards to the affordability of brownfield sites, we understand that EcoHolmes is a Charity Land Trust and they rely on free and/or cheap land, and that brownfield sites often come with a high price tag which they can't afford. But that **should not** give them the green light to build on the Old Quarry (Chippings site) which is designated green belt land!!! There are **brownfield sites*** and empty properties dotted around the Holme Valley where EcoHolmes and other developers could and should be encouraged to provide the much-needed affordable homes, before permission is granted for building on green belt land (*see Brownfield Sites details below). If EcoHolmes can't afford the land alone, Kirklees Council should be working collaboratively with EcoHolmes and larger developers to ensure that brownfield land that is available is developed to provide the necessary affordable housing for the Holme Valley.

EcoHolmes have stated on their website their reasons for wanting to build on this piece of green belt land, despite being an 'eco organisations'.

Q7. This is a Green Belt site. As a so-called environmentally friendly organisation, how do you justify undermining the Green Belt policy and opening the door for other developers to build all over our green spaces?

We are requesting the use of this site on an exceptional basis because of the proven lack of affordable housing in the local community. This **rural exception policy is government policy** and part of the Council's Local Plan as a means of providing affordable homes where insufficient building land exists. **This policy recognises the rights of communities to have the housing it needs and wants, even within the green belt.** If agreed (and it is a high threshold of proof required), the homes would have to be affordable and allocated to people with a local connection. This will be a planning condition. No commercial developers can make money from only charging affordable prices, so it is very unlikely to create a precedent.

Whilst we agree that developing brown field sites would be the ideal, there are few identified locally and these are either not available or are available at full market value; the economics of which would prevent the provision of low cost, low energy housing.

EcoHolmes are conscious of the wider environmental issue of global climate change. Accepting that new affordable houses are needed, we passionately believe they should be better built, and our proposals offer high quality, low-energy homes, in a community environment, with green space and provision for enhancing biodiversity on the site.

**Image of question/answer taken from the Chippings FAQs on EcoHolmes website <https://ecoholmes.org.uk/1895-2/>*

Yet in their latest AGM they have stated that their next steps are to look for 'smaller, viable brownfield sites in the valley bottom or retrofit existing properties where available'. We believe they should be exploring the brownfield/retrofit options NOW, before even considering building on this piece of green belt land!

EcoHolmes Community Land Trust
PROVIDING AFFORDABLE LOW-ENERGY HOMES

What Next for EcoHolmes?

Continue to promote our vision for more homes that local families need which are:

- ✓ Affordable
- ✓ Low-energy - energy efficient, low-carbon, sustainably built
- ✓ Lifetime homes and inter-generational housing schemes
- ✓ Have communal spaces – gardens, seating, play areas

We are looking for:

- ✓ On smaller sites in the valley bottom
- ✓ Using viable brownfield sites and/or retrofit existing properties where possible
- ✓ Supporting jobs and the local economy – sites or properties for 'live/work' homes



**Image of slide taken from the most recent AGM notes on EcoHolmes website*

<https://ecoholmes.org.uk/wp-content/uploads/2022/05/EcoHolmes-CLT-AGM-slides-FINAL-HANDOUTS-2022-04-28a.pdf>

In addition to the above, the HOLME VALLEY NEIGHBOURHOOD DEVELOPMENT PLAN has now been adopted and forms part of the development plan alongside the Kirklees Local Plan. However, approval of the proposed development would be in conflict with the objectives of the NDP with regard to policies 10 and 13 in particular, and also the results of both community and public consultation and engagement (NDP refs 4.1.24 and 4.5.8) citing *'residents gave a clear message that to support the preservation of the landscape, brownfield sites should be developed rather than greenfield', and, 'specific areas are often cited such as Scholes..... no more housing in these areas, the roads, services, schools etc can't handle the influx of new residents.....Green belt to be preserved'*.

Please see below extracts from both the Holme Valley NDP and Kirklees Local Plan that support our objections to building on green belt land.

"living" and "blue" roofs⁵ where adverse impacts on local character and distinctiveness are minimised.

Community Consultation and Engagement

- 4.1.24 Residents gave a clear message that to support the preservation of the landscape, brownfield sites should be developed rather than **greenfield**. The 2017 consultation identified that 89% residents thought that 'new building on brownfield sites should take priority over greenfield sites' with comments including "Of course brownfield sites should be used. Once the green areas are gone, they are gone forever".

- 4.5.11 There is also support for the brownfield first policy with 89% consultees in 2017 supporting the use of brownfield sites over **greenfield** ones and as mentioned in 4.5.9, there was considerable local **resistance to housing development on green fields in Scholes and Hade Edge**. The lack of activity in developing locations such as up New Mill Road where sites HS177 and HS191 have sat redundant, overgrown and fenced off for years has given the local impression that developers prefer taking on greenfield sites instead. This causes local frustration which has been reiterated through later consultation with Regulation 14 comments including **'Be the first authority to insist on re-use of brown field sites'** and 'the NDP should allow for a phased release of sites, preferencing brownfield sites over greenfield sites, small and medium sites over large sites; extant permitted sites over unpermitted sites, to ensure land is released in an orderly and appropriate manner, reflecting community needs, and minimising the potential for land banking of sites by developers and speculators'.

Public Consultation and Engagement

- 4.5.8 There is considerable concern locally about the number of new dwellings and the impact of the potential associated increase in population on the nature of life in the Valley. One Regulation 14 respondent said 'Before any new housing is permitted there needs to be proper consideration to the infrastructure, not just lip service! Roads, drains, sewerage, schools, shops...' whilst another commented that 'Upperthong area is now at saturation point... Poor sight lines, narrow roadways and limited pavement provision must be obvious problems'. Specific areas are often cited such as 'Scholes, Hepworth, Wooldale: no more housing in these areas, the roads, services, schools etc, can't handle an influx of new residents. New homes should be built on brown fields only. Green belt to be preserved.' It is noteworthy that both Hade Edge and Scholes communities strongly resisted the new housing developments in the Local Plan during its Examination, setting up 'Hade Edge Fight for the Fields Group' and 'Scholes Future Group' to provide coordinated responses to the consultation. The latter contributed nearly 600 objections to the proposed housing site in Scholes and indeed, its size was duly reduced by the Planning Inspector. Representations were also made on behalf of other local groups and people by the Holme Valley Vision network.

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<https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf>

- 15.11 National planning guidance does not support the opening of new opencast coal sites unless they meet strict criteria regarding environmental impact or provide overwhelming community benefits. The Coal Authority and the British Geological Society have identified areas where surface coal exists and where coal has been identified by prospecting and all these areas which fall within the **Green Belt** will be safeguarded.

- 19.2 Kirklees has an extensive area of land designated as Green Belt, representing about 70% of the total land in the district (excluding the Peak District National Park). The National Planning Policy Framework (NPPF) recognises the importance of the Green Belt, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. The essential characteristics of the **Green Belt** are its openness and permanence. Within the Green Belt there is a presumption against development which would be harmful to the purposes of including land within it. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. The approach to development in the Green Belt is set out in national policy guidance and in the Local Plan as a whole, and is designed to ensure that development that is appropriate, as well as development that is inappropriate but for which there are very special circumstances that justify its acceptance, results in minimal harm to the purposes of including land in the Green Belt.

- 19.6 The National Planning Policy Framework (NPPF) states that great importance is attached to Green Belts, the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. Green Belts are said to serve five purposes:

19 Green Belt and open space

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

19.1.7 Limited infilling in villages

- 19.31 National planning guidance states that new dwellings may not be inappropriate in the Green Belt where they constitute limited infilling within villages. There are a number of smaller settlements in Kirklees which are either overwashed by the Green Belt or inset within it and the level of services contained within these settlements varies considerably. Any application for infill development within the Green Belt will therefore be judged in the first instance on whether the settlement is a village for the purposes of Green Belt policy. If it is established that the site is within a village the plot should be small, normally sufficient for not more than two dwellings and within an otherwise continuously built up frontage.

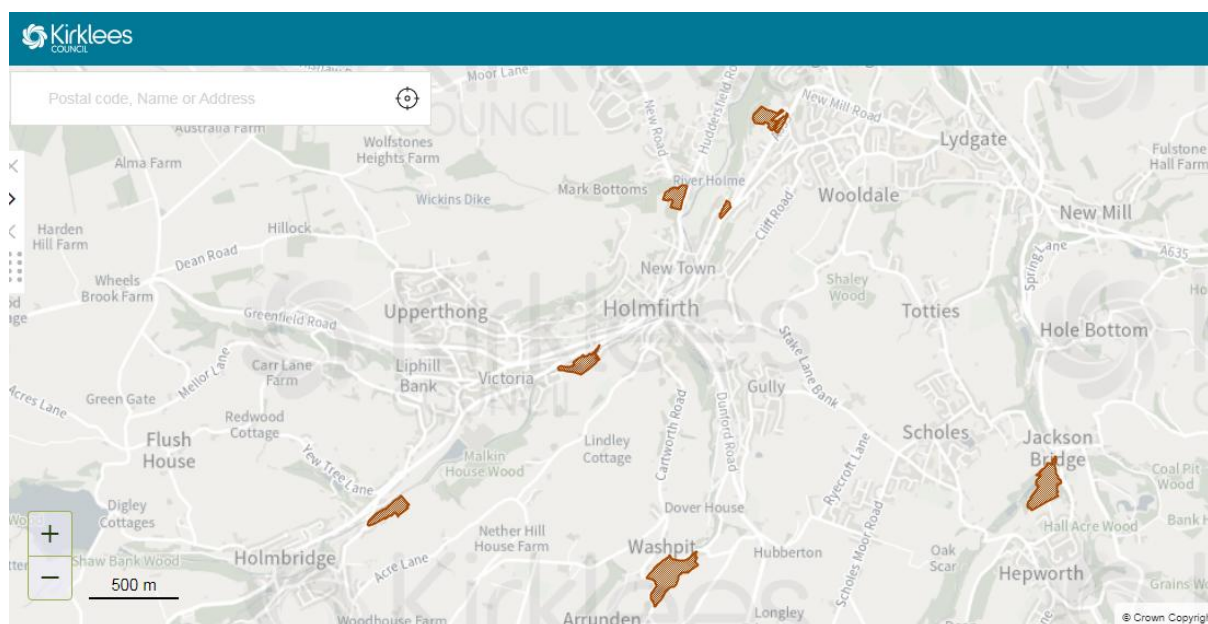
Proving the need for affordable housing

We are aware that EcoHolmes have to prove a 'need for affordable housing in Scholes' in order to obtain the 'rural exception' for building on green belt land.

We understand that the housing surveys carried out by EcoHolmes covered the whole of the Holme Valley, and their results focussed on an area wider than Scholes village, so we believe these results **should not** be used to 'prove the need for affordable housing in Scholes'. We also have little confidence in EcoHolmes proposals for ensuring these houses will only be available for people with local connections to Scholes, such as family or work (there are next to none jobs available in Scholes) and we believe these houses will NOT remain for 'local people only in perpetuity!'

We are also aware that a housing development is planned for a large brownfield site in Jackson Bridge/Hepworth, which is very close to Scholes, and we believe that this site would be much more suitable to provide the required affordable housing to meet the needs identified by the EcoHolmes surveys. We would urge Kirklees Council to get behind this and push for the developers of the site to provide the necessary affordable housing on this brownfield site and save the Old Quarry (chippings) green field site in Scholes.

*Brownfield Sites in Holmfirth



cil/kirklees	BLR_041	"Westwood Mill, Lowestwood Lane, Linthwaite, Huddersfield, HD7 4RR"
cil/kirklees	BLR_042	"Land at, Station Road, Holmfirth, HD9 1AE"
cil/kirklees	BLR_043	"Travel Station Yard, Station Road, Honley"
cil/kirklees	BLR_044	"1, Wood Bottom, Marsden, Huddersfield, HD7 6NE"
cil/kirklees	BLR_045	"Dobroyd Mills, Hepworth Road, New Mill, Holmfirth, HD9 1AF"
cil/kirklees	BLR_046	"Former Midlothian Garage, New Mill Road, Holmfirth"
cil/kirklees	BLR_047	"Hinchcliffe Mill, Water Street, Holmbridge, Holmfirth, HD9 2NX"
cil/kirklees	BLR_048	"Royd Edge Dyeworks, Holmfirth Road, Meltham, Holmfirth, HD9 4BH"
cil/kirklees	BLR_049	"Hoyle Ing Dyeworks, Hoyle Ing, Linthwaite, Huddersfield, HD7 5QS"
cil/kirklees	BLR_050	"Taylor Valve Works, Dowker Street, Milnsbridge, Huddersfield, HD3 4JX"
cil/kirklees	BLR_051	"New Mills, Brougham Road, Marsden"
cil/kirklees	BLR_052	"Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU"
cil/kirklees	BLR_053	"Former Storthes Hall Hospital. Storthes Hall Lane. Kirkburton. Huddersfield. HD8 0WA"