

20 September 2022

Dear Nick Hirst
Case officer Kirklees Planning

Nick.Hirst@kirklees.gov.uk

dc.admin@kirklees.gov.uk

Land Adj, 67, Chapelgate, Scholes, Holmfirth, HD9 1SX

2022/62/92406/W

GREENBELT:

First and foremost, I would like to address the issues about whether this application is in greenbelt or brownfield as some of the comments already made suggest it is or has been brownfield in the past.

Land with the title number WYK530809 is in GREENBELT and has at no point in the past has being designated or registered on HM Land Register Nottingham Office <https://www.gov.uk/government/organisations/land-registry> as anything but GREENBELT. In fact in the past the Holme Valley Land Charity [Holme Valley Parish Council] put a planning application on this land but was advised to withdraw it as it was in GREENBELT.

To my knowledge to register Greenbelt to Brownfield you would need to ask the Secretary of State to agree to this and I am under the impression that this has not been applied for so the land remains to this day in GREENBELT.

I acknowledge that at some point in the past Kirklees stored road clippings on the land. However, even at that point the site was designated GREENBELT as I cannot find any legal evidence of any-other.

Brownfield sites available on the Kirklees Brownfield Land Register close to the development. There are others in the Holme Valley.

Site Reference: BLR_045

Address: "Dobroyd Mills, Hepworth Road, New Mill, Holmfirth, HD9 1AF"

Site Reference: BLR 113

Address: "Washpit Mills, Choppards Lane, Cartworth Moor, Holmfirth, HD9 2RD"

Site Reference: BLR_042

Address: "Land at, Station Road, Holmfirth, HD9 1AE"

Site Reference: BLR 052

"Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU".

This brownfield site is in the centre of Holmfirth close to the local public transport hub so would be a more suitable site for Eco Homes as residents would not need a car for commuting to work and shopping making an ECO project even more environmentally friendly. This is another reason the current application should be rejected as it does not fit the ECO criteria to justify building on greenbelt as you would have to drive there.

Housing needs in Scholes including affordable rented homes and homes to buy.

I'm aware that land within the greenbelt can be built on in very special circumstances for the likes of affordable homes. I have not read legislation that building ECO homes fit this criteria so should be refused on greenbelt and an alternative brownfield site should be used as recommended within the Holme Valley Parish Councils very own Neighbourhood Plan which is now in act so should be "seriously taken into consideration" by Kirklees Planning.

I am under the impression that there is insufficient evidence within Scholes where the application is situated that there has been the required amount requests to Kirklees Neighbourhood Housing for social rented housing needs, therefor, under planning requirements there would not be any "special circumstance" for any rented social housing to be built in Scholes on greenbelt. Kirklees Housing will have recorded evidence of any needs or requests for "social rented housing" in Scholes.

I can personally only see a need for truly affordable housing in Scholes that can be "**bought outright [via a mortgage] rather than rented**".

This application is ONLY for "rented social housing" at market value rent only and not a rental value below as Eco Homes appears to be suggesting. As we all know rent is currently on the majority higher than a mortgage so what is needed is truly affordable houses to buy rather than to rent so proving there is **NO "special circumstance"** for anymore expensive rented social housing proving this application should be refused with it being on greenbelt.

In The Kirklees "Local Plan" there was and is a large amount of land designated in Scholes and Hade Edge for building of which also has "affordable housing

requirements” of which planning applications were passed and houses recently newly built. The applications would have the legal amount of affordable housing requirements and planning needs within these developments. Hence the current amount of “affordable housing” [council housing / housing association, social housing and shared option schemes] will have been catered for in the “Local Plan” for Scholes and nearby Hade Edge.

In relation to this application, this would mean there would already be more affordable social rented homes than is required according to the “Local Plan” needs taking away any need to build on greenbelt with “special circumstances”. Any excess affordable social rented homes should therefore be built on brownfield sites within the Holme Valley and Kirklees. In fact **the Planning Inspector duly reduced the amount of housing for Scholes on the Local Plan so as to preserve parts of the village from building too many houses on greenbelt, so another reason to reject Eco Homes application on greenbelt.**

Eco Homes will hand over the site to a “social housing association” for market value RENT only. Eco Homes States that the 10 Eco Homes “would be for local people within the Holme Valley”. Surely this would be discriminatory and against Kirklees Housing association policy. I am led to believe that housing associations are not allowed to discriminate against who had a social housing association house for rent and whether they come from the Holme Valley, Scholes or from anywhere in Kirklees. I am led to believe it was first come first served when allocating rented social housing through housing associations so this would be seen as misleading information regarding rented housing needs on greenbelt so this application should be rejected on the misrepresentation of the application if this is the case.

In fact I will go on to point out that Scholes is densely populated with small one and two bed cottages so there are plenty of affordable homes to buy and rent within Scholes. The unfortunate current economical factor is that the price of truly affordable houses to buy and rent are currently too expensive, especially for first time buyers but this development / application would not be able to go against as market price forces so would add to the expensive “rented social housing” market rather than add to the affordable housing market for housing to buy of which the latter is the big issue within current housing market within Scholes and The Holme Valley. On these grounds the application for Eco “rented social housing” on greenbelt should be rejected and reapplied for on available brownfield closer to public transport whether in the Holme Valley or Kirklees.

arc4 <https://www.arc4.co.uk/about-us> did the social housing survey for the applicant but I would like to point out that it appears from their website that arc4 heavily supports social housing and because of this then I personally feel that the survey is not a fair and independent representation of the need for rented social housing. Therefore, I would argue that affordable rented housing needs on the Kirklees “Local Plan” and Kirklees neighbourhood housing association lists are far more applicable for Scholes, The Holme Valley and Kirklees and should be acknowledged by Kirklees planning.

I also feel there is a conflict of interest with Eco Homes and Kirklees as Kirklees Neighbourhood Housing use arc4 for data. <https://www.arc4.co.uk/clients>

I would like to see the evidence from “Kirklees Neighbourhood Housing” for how many requests were made by the public for affordable “rented housing association” properties in Scholes were enquired about?

Holme Valley Parish Council Neighbourhood Development Plan (NDP) was formally made on 8th December 2021

Within the NDP it mentions “**avoiding building on GREENBELT**” and goes on to say that, “**building on brownfield should be of first choice**”.

Just some of the comments in the Holme Valley Parish Council NDP of which has recently been adopted by Kirklees.

[https://www.holmevalleyparishcouncil.gov.uk/ UserFiles/Files/NDP/Holme%20Valley%20NDP%20Made%20Plan%20December%202021_extreme_compressed.pdf](https://www.holmevalleyparishcouncil.gov.uk/UserFiles/Files/NDP/Holme%20Valley%20NDP%20Made%20Plan%20December%202021_extreme_compressed.pdf)

Page 7 “protection of the rural nature, green belt and fields”.

Page 27 “Neighbourhood Area where Kirklees Council is the local planning authority are protected by Green Belt”.

Page 85 “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”.

Page 86 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.

“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”.

I could go on... However, **I would agree with what it says in the NDP and on these grounds alone the application should be rejected on greenbelt by Kirklees Planning.**

HIGHWAYS ISSUES:

There are issues with this application due to site-line issues as the land is on a very tight blind bend and steep hill so cars coming up the hill naturally drive faster to keep momentum.

There are already residents that park on the other side of the road to the application outside their own houses and if this application was approved there would be overspill of parking for visitors to the new houses that would have to park wherever they could and that could potentially displace parking for the local residents that already live there which would add to Highways issues and safety.

No footpaths either-side of Chapelgate and Dean Bridge Lane so people have to walk on the road next to Land Adj, 67, Chapelgate, Scholes, Holmfirth, HD9 1SX If there was a payment put next to the proposed development it could not be put the full length of the road on either-side so would not add to safety people walking or crossing the road in this location.

Summery:

Refuse, building on greenbelt as the Holme Valley Parish Council Neighbourhood Plan states that building on brownfield first and avoid building on Greenbelt

The Planning Inspector duly reduced the amount of housing for Scholes on the Local Plan so as to preserve parts of the village from building too many houses on greenbelt

Already allocated affordable rented social housing catered for in the "Local Plan" for Scholes and Hade Edge.

No satisfactory or independent evidence from "Kirklees Housing association" on the need for affordable "rented social housing" in Scholes. [more affordable housing you can buy is needed so Eco Homes plan should be refused on greenbelt.

Highways issues especially site-lines

I would like Kirklees Planning to reject this application on all the grounds above.

Yours faithfully