



# **Kirklees Local Plan Examination**

## **Stage 1 – Initial Hearings**

### **Hearing Statement**

**Submitted on behalf of Upper  
Dearne Valley Environmental  
Trust (registered charity number  
1157540)**

**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. The Upper Dearne Valley Environmental Trust has already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, the Upper Dearne Valley Environmental Trust wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Upper Dearne Valley Environmental Trust also wish to speak at the hearing in relation to Matter 2.
2. Matter 2 – questions (a) and (b)
  - 2.1 The Upper Dearne Valley Environmental Trust do not consider that the boundaries of the sub-areas are appropriately defined. Nor do they consider that the framework for future growth and development of the different sub-areas of Kirklees is appropriate.
  - 2.2 Kirklees is very diverse from high density urban areas to very sparsely populated rural areas. This is not fully represented by the four sub-areas which are proposed.
  - 2.3 The four sub-areas do not provide sufficient division in terms of character, nature and economy.
  - 2.4 Future growth and development in the different sub-areas is not appropriate across the whole sub-areas as they contain areas which are very different to each other in terms of character, nature and economy.
  - 2.5 The Upper Dearne Valley Environmental Trust considers that clearer sub-division is required to ensure that areas within a sub-area share characters, nature and economies and have similar planning constraints and opportunities.
  - 2.6 Neighbourhood Plans could be a way of ensuring that areas sharing planning characteristics could be shaped appropriately.
  - 2.7 Unfortunately, the Council have been less than keen on promoting Neighbourhood Plans and without the Council's support very few have moved forward. For example Denby Dale Parish Council is reluctant to move plans forward without the Council's full backing.
  - 2.8 In relation to the Dearne Valley in particular how is there a clear framework for future growth and development when the Local Plan is telling us that there is a shortage of employment land and proposing green belt release to

accommodate the requirement employment land (such as E2333a) but then proposing the reallocation of existing employment land for housing (such as site H3325a)?

2.9 The Council have repeatedly over the years allowed existing employment land to be reallocated for housing and continue to do so. What is the strategy and framework for growth in this area is it employment or is the need for housing?

3. Matter 2 – question (e)

3.1 The Upper Dearne Valley Environmental Trust do not consider that 1072 new homes and 15 hectares of commercial development within a 2.5 miles stretch of the rural Dearne Valley is justified. The areas character would be totally lost.

3.2 There are significant infrastructure constraints which the Upper Dearne Valley Environmental Trust have previously identified within their representations to the draft Local Plan, not only the fact that there is only one way in and one way out of the Valley via one A road (A636) and a connecting B road (B6116).

3.3 The Dearne Valley area does not present the opportunity to provide the level of housing or employment land proposed for it.

3.4 The Dearne Valley is not able to sustain its current level of homes and employment land. Any increase of homes and employment land by the numbers proposed is totally unsustainable.

3.5 The size and scope of the planned development in the Dearne Valley is unsustainable and would put the health and safety of the existing community at severe risk. It needs revising and amending to a Plan which can be supported by the existing road network and infrastructure.

3.6 The second highest allocation of new housing (over 5,100 dwellings) has been made in the most unsustainable areas of Kirklees – Kirklees Rural. This level of development is unjustified and presents an unsustainable and undeliverable pattern of development.

4. Matter 2 – question (i)

4.1 The Upper Dearne Valley Environmental Trust does not consider that there are any policies proposed within the Local Plan which will ensure that the development of brownfield sites will be released early in the Plan.

4.2 Policy PLP3 may provide a framework on locational requirements. However, the Local Plan then goes on to allocate sites, such as H3325a and E2333a which doesn't accord with Policy PLP3.

5. Matter 2 – question (j)

- 5.1 The Upper Dearne Valley Environmental Trust have not seen an air quality assessment of the Dearne Valley which comprehensively assesses the combined impact of all the proposed development within the Dearne Valley on Air Quality and Carbon Emissions and this is needed.
- 5.2 The Local Plan is not taking a serious approach to reduce CO2 emissions and the Local Authority is not meeting its legal obligations as there are no targets for CO2 reductions.
- 5.3 In the Dearne Valley the Local Plan is likely to significantly increase CO2 levels in the valley bottom and through its villages owing to increased traffic congestions and standing traffic owing to traffic being channelled onto 2 totally inadequate local roads not built to take vastly increased traffic levels resulting from the proposed housing allocations. Standing traffic (as now) will occur directly outside schools and housing with no or very little frontage to the road itself.
- 5.4 The Council have identified Air Quality as being a potential constraint to proposed allocations such as E2333a but nothing appears to have been proposed to deal with this constraint.