

Matter 26

c) iii and i)

The Planning Inspector may wish to note that the word "sewage" does not appear in either Part 1 or Part 2 of the Local Plan except in reference to Treatment Works and connections. As was pointed out during the earlier hearings, there is considerable concern in the Holme Valley regarding the drainage system's ability to cope with the human waste generated by the additional houses. This view is based on local people's recent experience of overflowing drains, particularly on Dunford Road.

Many of the sewer systems running down the hills comprise old and small sized pipes. We are concerned about the systems' ability to cope and the risk of pollution.

Surface water run off is another but different concern. We believe that all new surfaces and replacement surfaces on the hill side and hill tops should be permeable to allow for water to soak into the ground rather than all of it run away through the drains and down the road sides.

Therefore, having and publishing master plans for large sites or sites where incremental growth have placed an additional, large load on the systems make sense.

- c) iv Policy PLP 23 relates to the Core walking and cycling network and refers to the provision of an integrated system that will provide for alternative sustainable means of travel including bridleways. While wishing to encourage horse riding, we do not believe that many people will use their horses these days to go to the shops. The first paragraph of PLP 23 should be amended accordingly.

Horse riding, in reality now is a leisure activity and we applaud the second paragraph. Sadly, most bridleways in the area no longer link and horse riders are obliged to use the road network, an increasingly dangerous activity. An example of this can be found in H729 where a bridleway has been in effect lost because of housebuilding.

We note that the expenditure on the maintenance of footpaths and bridleways has been cut back considerably in recent years. How will the Council ensure that the core walking and cycling network be maintained during the life of the Plan?

The third paragraph should include reference to bridleways as should the fifth.

- e) As so many sites in the Valley, particularly those that have caused significant concern, have been granted planning permission, it makes sense for Part 2 to include as much up to date information as possible. Failure to do so will mislead people.
- h) We consider the provision of affordable housing an imperative and are very concerned about the imbalance being caused by the recent planning permissions. Most new houses are large and comparatively expensive. Local people recognise the need for smaller, lower cost houses and would like to see more such properties being built. The majority of recent planning permissions granted for new houses in the Holme Valley have been for large properties. Even the smaller ones are comparatively expensive.

We note that the Cushman Wakefield document of April 2017 identifies the capital sales values likely to be accrued by the Council from the sale of its land (circa £1 bn) and would be interested to know how much of this will be earmarked for social and affordable housing.

Has the Council formulated any plans for the use of this capital gain?

j) and k)

We would like to see the Council take a far more innovative, leading edge approach to flood mitigation and be far more pro-active in its efforts to reduce carbon emissions. By its very nature, the hillsides around the Holme Valley comprise water courses, cloughs, aquifers and springs.

Flood mitigation could be done by reducing the amount of building on the Valley sides and hill tops, requiring hard surfaces to be permeable and planting more trees. Other actions could include improvements to ditches, cloughs and the provision of means for water holding, storage or capture. The design standards for new buildings, extensions and refurbishments requiring planning permission, could also include requirements for the use of porous surface materials, carbon emission reduction and energy saving measures.

Moreover, interfering with the natural water flows has, sometime unanticipated, consequences on surrounding properties. Will the Council indemnify against such risks?

We also regret, as we have already said, that Kirklees has seen fit to locate most sites allocated for employment growth in areas well removed from the areas that will see the growth in housing. The poor public transport services in those areas and people's personal preferences will inevitably increase car journeys, on road networks that are struggling to cope with present, never mind, increased traffic loads.

This need not have been the case. Greater use of mixed sites and encouragement to land owners to bring forward brown field sites, rather than giving the green light to developers to build on green fields and the green belt, was and still is an option that would enable Kirklees to live up to its stated policies.

We note that the Inspector questions the justification of the change in use of Bridge Mills site from employment to housing. We are asking the same question and are struggling to provide an answer as to our knowledge, nothing is being done to help the businesses currently located there (about 40) to remain in the Valley.

l) We believe that the Council's approach to the allocation of land for employment uses to be old fashioned, backwards looking and unrealistic. Further comments will be made below in our response to the Employment Land Supply Briefing Note dated November 2017.

o) Planning permission has been granted to site H288a. Concerns about the impact on South Pennine Moors were rejected by the Planning Committee. This also shows that the decisions of the Planning Committee are making the Local Plan out of date before it is finalised. We believe that this applies also to MX1912 and to H297. Building is due to start on the latter site.

Kirklees Council appears to be rushing to approve applications. In one case, when prematurity was given as a reason for refusal, one Councillor intimated that the Local Plan was already in existence and as the site was included, permission should be granted.

We feel that Kirklees pays lip service to public consultation and the views of local people. We can see little if any evidence of our views been taken into account during the development of the Local Plan (or consideration of planning applications) yet we believe there is evidence of developers' interests being met. How can we have any faith in the process when we feel that our views are not wanted or respected?

p) Proper consideration of safeguarded land has not taken place as the focus locally has been placed on the land immediately allocated for housing in the Local Plan. There are two sites in the Holme Valley which if local people had fully appreciated the meaning of the term "safeguarded" would have caused considerable concern. These are SL2191 (Cliff Road at 6.26 ha) and SL2189 (off Huddersfield Road at 4.39 ha). If the same density figure as seen elsewhere in the Valley (c30 houses per ha) is applied, this represents 188 and 132 houses respectively, totally another 320 houses. Road access to the Cliff is dreadful.



Holme Valley Vision
Response to Matter 26
regarding Kirklees Council's Local Plan

The other safeguarded sites, particularly in Holmebridge and Hepworth are also in areas with poor road connections, caused, in many cases, by the necessity of on-road parking.