

MR J D F ROBERTSON

I wish to object to Kirklees Development Plan under the following two criteria using Site H.591 as an example.

### Matter 3 – Overall housing need

Issue - Is the identified objectively assessed need of 31,140 dwellings soundly based and supported by robust and credible evidence?

a) Does the identified Kirklees Housing Market Area provide a robust and appropriate basis for assessing housing needs?

f) Should the assessment of OAHN take account of Unattributable Population Change?

1. The Sustainable Appraisal Report of the Kirklees Local Plan page 1639 SA Objective 3. states that the plan must ensure education facilities are available to all.

By their own formula Kirklees estimate that three primary and preschool places are created per school year per 100 new households plus a further two for secondary school places.

If H591 is included in the Local Plan it will allow 135 new households to be built which will require an additional 28 primary and preschool places in Gomersal plus an additional 19 secondary school places.

Concentrating solely on the primary and preschool situation, the two schools in Gomersal are already oversubscribed. Classes are at their maximum of 30 pupils and new building would be required to accommodate the extra intake.

2. The former Whiteley's Mill on Spen lane on the boundary of Gomersal and Cleckheaton is now fully demolished. This brownfield site is owned by Tesco who currently wish to sell it for housing.

This site is larger than the H 591 site and is more accessible to public transport, local amenities without car movements and education facilities. Utilisation of this brownfield site would allow Kirklees Council to meet its national housing requirements without excessive removal of green belt.

3. Please note that this submission is in addition to two previous and more extensive submissions objecting to this plan sent to Kirklees during the consultation period.

I assume that these submissions are still on file and active in this consultation process.