

Heather M Allan

I wish to submit my representations against the Kirklees Development Plan - using Site H591 in Gomersal, on three criteria for housing in Gomersal and needs for Gomersal specified below:

**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?**

and

**Matter 4 – Housing land supply and delivery**

**Policy PLP 6**

**Issue – Is the identified overall housing requirement in the Plan (31,140 dwellings) justified, deliverable and consistent with national policy?**

**Under the National Planning Policy Framework - paras 154 and 156 it states:**

154. Local Plans should be aspirational but realistic. They should address the spatial implications of economic, social and environmental change. Local Plans should set out the opportunities for development and clear policies on what will or will not be permitted and where. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan.

156. Local planning authorities should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:

**the homes and jobs needed in the area**

Under the Publication Draft Kirklees Local Plan - Sustainability Appraisal Report for site H591, (page 1639) Objective 2, it states "the location of housing sites will not affect the success of the local economy. While housing may result in job creation during the construction phase, this will not be influenced by the location of the development. Housing provision may also affect the size and location of the local workforce; however this is considered separately under SA Objective 1 above (p.1639). Therefore the effects of all residential site options will be negligible.

If one site eg H591 does not meet the two criteria list above from the I suggest that the Plan is not sound due to the following points in the EXAMINATION GUIDANCE NOTE - July 2917 (v.1) item 5 point 3.

and

### **Matter 8 – Approach to site allocations and Green Belt release**

Issue – Is the Plan’s approach to identifying site allocations (housing, employment and mixed use), safeguarded land and Green Belt releases soundly based and in line with national policy?

**a) Has the Council undertaken a robust and comprehensive assessment of development capacity within existing urban areas and other areas outside the current Green Belt?**

**b) Do exceptional circumstances exist which justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional land for employment uses?**

1. Gomersal, over the last five years, has already had major and minor housing developments completed or proposed in the area:

360 (approx) houses directly opposite site H591 egressing onto Cliffe Lane, built on the brownfield site of the former Thomas Burnley Mills (completed)

18 houses built on the former brownfield site of Roundhill Mill, egressing onto Cliffe Lane (completed)

1 house directly opposite the site, egressing onto Cliffe Lane (completed)

3 - 4 houses on West Lane in the conservation area being built within 440 yards of the proposed site

36 flats on the brownfield site of MACCESS within 440 yards of the proposed site

2 flats on the site of the Old Police Station within 440 yards of the proposed site

46 houses on the brownfield site of Highgrove Beds (outline planning consent)

2 approved houses on Latham Lane (planning consent granted)

Gomersal First School land - used as residential accommodation

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2. I submit that Gomersal is already oversubscribed with new housing (470 approx) and therefore the village of Gomersal does not need any more housing, especially by using precious greenbelt in the area. There are no exceptional circumstances which justify the release of greenbelt land to accommodate new housing.

3. In the Commons White Paper, 12 July 2017/ Commons Library Briefing, 12 July 2017, The white paper set out that the existing protection for the **green belt** should remain unchanged and emphasised that authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements.

4. A spokesperson for the Department for Communities and Local Government said of the CPRE figures: This government is committed to protect the green belt. Only in exceptional circumstances may councils alter green belt boundaries, after consulting local people and submitting the revised local plan for examination.

“We’ve been absolutely clear that councils must prioritise development on brownfield land, and have announced plans to radically boost brownfield development and bring life back to abandoned sites.”

5. I do believe that in the ward of Liversedge and Gomersal, Gomersal does not need any more housing at all and certainly none on the Green Belt as this would be detrimental to the area.