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Mr P Oldfield

23rd January 2018

Kirklees Local Plan – Stage 4 Site Allocation Hearings

Huddersfield Sub-Area (Matters 30-33)

Matter 30 – Huddersfield housing allocations: Green Belt Releases

Site H519 – Land north and west of Gernhill Avenue, Fixby (377 dwellings)

Issue – Are the proposed Green Belt release housing allocations in the Huddersfield Sub-Area justified, effective, developable/deliverable and in line with national policy?

General Challenges & Objections:

- At a summary level, and consistent with all previous submissions, our challenge is that the allocation of H519 is neither justified nor effective for reasons that follow.
- Green Belt land has multiple purposes including; protecting against urban sprawl, providing open spaces for social purposes, contributing to the semi-rural ambience of Fixby and supporting a variety of wildlife.
- The protective buffer against urban sprawl has never been more relevant and necessary due to the lack of joined up planning between Kirklees and Calderdale and the proposed major back to back new house building proposals.
- As referenced and acknowledged in the Stage 1 hearings, the Council has failed to demonstrate a duty to cooperate with neighbouring Councils in order to develop a sustainable and sensible plan. This is evidenced by Kirklees' proposals to develop c. 3000 new houses in the North Huddersfield (Fixby/Ashbrow) area, whilst in parallel, Calderdale plans to develop 6000 new houses, with a high proportion of these being in the Brighouse area and directly adjoining the proposed Kirklees developments.
- There is no clear justification for the proposed number of new houses across Kirklees and no obvious revisiting of the plans post Brexit (which other councils have undertaken), which places an even greater emphasis on fully utilising the available brownfield sites before considering any permanent destruction of the Green Belt. There is a clear lack of a sensible, justified, agreed and effective plan for this.
- The current plan proposes the use of Green Belt land for 11,500 of the target 31,140 new dwellings, which seems disproportionate given the stated objective of 'giving sufficient recognition to the protection of the Green Belt and the countryside'.
- In isolation, the number of proposed new houses and percentage Green Belt destruction in the heavily urbanised North Huddersfield/Fixby area is also significantly disproportionate.

- **The Kirklees Local Plan has been anchored around 10 strategic objectives and all local resident responses to date have been based upon these commitments being upheld via the Plan.** 4 of the 10 objectives are directly contradicted by the new house building proposals in the Fixby area:
 1. Protect and improve green infrastructure
 2. Provide access to good quality open spaces and opportunities for sport, recreation and play.
 3. Protect and enhance the characteristics of the built, natural and historic environment and local distinctiveness.
 4. Promote the use of brownfield land.

In response to the H519 site specific questions:

a) Has the impact of the proposal on the historic environment been adequately assessed and appropriate mitigation measures put in place?

- We have received no information about any analysis undertaken or proposals to mitigate but look forward to receiving this at the earliest opportunity and before any site allocation decisions are taken.
- In the meantime, the destruction of the Green Belt buffer in the Fixby area will clearly have a major impact on the local environment and should be rejected in favour of alternate solutions.

b) Is the site available and deliverable in the timescales set out in the Council's housing trajectory?

- There has been a significant amount of activity in and around the H519 Lower Cote Green Belt field, including what clearly appears to be site preparations for imminent building work. There is clearly a view that the site is available and deliverable but the amount of preparatory activity seriously questions the openness, benefit and impartiality of the independent Local Plan review and in order to re-build trust we would expect that all raised concerns and objections are fully assessed.
- However, the key point has to be the Council's commitment to use brownfield land in priority to Green Belt destruction and the plans for achieving this are not known.

c) What effect would the proposed boundary change and allocations have on the Green Belt and the purposes of including land with it? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?

- THIS IS THE KEY POINT. THERE HAS BEEN NO DEMONSTRATION OF ANY EXCEPTIONAL CIRCUMSTANCES REQUIRED TO SUPPORT THE ALTERING OF THE BOUNDARY AND THE DESTROYING OF THE H519 GREEN BELT LAND.
- Any exceptional circumstance must be underpinned by the complete exhaustion of alternative sites (including all non-Green Belt options) and a clear demonstration of true demand against projected supply. Neither have been achieved.
- As referenced above, the Green Belt provides multiple benefits that will be lost should it be destroyed through unnecessary house building:
 - It acts as a protective buffer against urban sprawl and this has never been more necessary due to the lack of joined up planning between Kirklees and Calderdale Council's and the proposed neighbouring new house building.

- It provides open spaces for social purposes and contributes to the semi-rural ambience of Fixby, which is why people choose to live in the area.
- It supports a variety of wildlife that is increasingly being squeezed out and threatened.

I look forward to expanding on these challenges and objections via the planned site-specific hearing meetings and also to receiving information demonstrating full consideration and robust analysis of all these points.

Regards

Paul Oldfield

(On behalf of Fixby Residents Organisation)