

Statement Regarding Matter 32

Submitted by:

Kirklees Community Action Network

Document Version

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Q ref	Matter 32 – Huddersfield Mixed Use Allocations MX1930 [and H481]
Issue	Are the proposed mixed use allocations in Huddersfield justified, effective, deliverable and in line with national policy?
KCAN Response	<p>We have no objection to redevelopment of this site, but are concerned that non-mineral development, at this point in time, would sterilise the important, underlying mineral resources, in <u>conflict with National planning policy</u>. Section 13 of the National Planning Policy Framework [NPPF] makes it very clear that valuable mineral resources should not be sterilised by housing or industrial development: The NPPF states that <i>“In preparing Local Plans, local planning authorities should:</i></p> <ul style="list-style-type: none"> • <i>Define Minerals Safeguarding Areas and adopt appropriate policies in order that known locations of specific minerals resources of local and national importance are not needlessly sterilised by non-mineral development, AND.....</i> • <i>Set out policies to encourage the prior extraction of minerals, where practicable & environmentally feasible, if it is necessary for non-mineral development to take place; AND.....</i> • <i>Not normally permit other development proposals in mineral safeguarding areas where they might constrain potential future use for these purposes”</i> <p>In our view it is entirely practical and environmentally feasible to extract the underlying mineral resources prior to future non-mineral development on this site and it is NOT ABSOLUTELY NECESSARY for non-mineral development to take place at this moment in time. We do not agree with spurious arguments that the Council and Government’s “need for housing” can or should outweigh national policies for mineral safeguarding.</p> <p>Without clear proposals for prior mineral extraction, the conflict with National Planning Policy effectively renders the site undeliverable as a housing or mixed use site, certainly within the timescales of the current plan. As it is a large “strategic” site, making a major contribution to land supply, that would also make the whole Local Plan unsound and undeliverable.</p>

Kirklees Local Plan Hearing Statement – Matter 32

For information we note that the whole of site MX1930 is underlain by high quality block sandstone in the “Rough Rock” strata. Whilst the quality of naturally occurring rock formations does vary, we note that “Rough Rock” is typically anything but “Rough”. It is typically high quality block sandstone that is often used on prestigious public and corporate developments throughout the UK. It is the same rock that Johnsons Wellfield Quarries have extracted from their numerous quarries in the Crosland Hill area over the last 100 plus years. Site MX1930 is also directly across the Blackmoorfoot Road from Johnson’s original “Wellfield” quarry site and their current rock cutting and processing plant. It is therefore an ideal quarry site to develop in operational terms. Further evidence of the existence of viable rock resources under site MX1930 is provided by evidence of historic small scale quarrying in various parts of, and immediately adjacent to, the site and by the high quality of the Rough Rock currently being extracted from the nearby Thewlis Lane quarry [ME2258].

During the recent Stage 2 [mineral] hearings, KMC Planning Officers confirmed that the provisions of the NPPF and Local Plan policies for mineral safeguarding would apply to site MX1930.

In our view site MX1930 is such an obvious candidate for high quality mineral extraction that we wonder why the Council have not considered it in the Local Plan as an alternative to sites ME2568, ME1975 and ME3324. We also wonder why it was not even mentioned as a potential alternative, in the recently “approved” planning application for a large scale, massively intrusive, new quarry, in the Green Belt at South Crosland [site ME2568]. We have asked the questions but not yet received satisfactory answers.