

Kirklees Local Plan Examination

Stage 4

Hearing Statement Submitted

By

Save Mirfield

Matter 34- Dewsbury and Mirfield Housing and  
mixed use allocations: Green belt release.

H2089

January 2018



**Matter 34 – Dewsbury and Mirfield Housing and Mixed-Use allocations: Green Belt releases. MX1905**

***Issue – Are the proposed Green Belt release housing and mixed-use allocations in the Dewsbury and Mirfield Sib-Area justified, effective, developable/deliverable and in line with National Policy?***

**H2089 – land south of Ravensthorpe Road / Lees Hall Road, Dewsbury (2,310 dwellings within the Plan period, 1,690 dwellings beyond the Plan period)**

1. Save Mirfield has already submitted representations in regards to site H2089 and trusts that the Inspector has read these representations and will take them into consideration. However, Save Mirfield wishes to make some additional comments relevant to the Inspector's questions and wishes to speak in relation to this matter at the appropriate time.
2. INTRODUCTION
  - 2.1 Prior to 1894, Mirfield was administered by the Church and then the Mirfield Local Board. In 1894 the Mirfield Urban district Council came into being and in 1973 it then became part of Kirklees. The Town council is able to set its own budgets for such things as grants. Surprisingly Dewsbury does not have an administrative entity and therefore no Town Council. Mirfield is therefore a town in its own right with its own history and individual characteristics
  - 2.2 Continual reference is made to Mirfield only being allocated 402 dwellings. This is misleading and indeed inaccurate; a point Save Mirfield raised in the Stage 1 hearings regarding poor Public Consultation and the booklet produced by Kirklees. There are actually around 970 dwellings allocated since the western end of The Dewsbury Riverside Development actually falls within the Mirfield boundary (Appendix1).
  - 2.3 According to the Kirklees Observatory website, the population of Mirfield at the 2011 census was 19,563 (confirmed by the ONS) and estimated to be **20,088 in mid-2016**. This is obviously considerably higher than the figure quoted in document EX38, and elsewhere, of 18,075. It also represents a population density of 14.5 (people per hectare) which is very high and way above that for the rest of Kirklees or the average for England (ref: Kirklees observatory) Such an increase in the population over recent years has impacted negatively on the infrastructure which has not undergone any real improvements since the 1950s. For example, looking at

healthcare provision, the number of people served by the GPs is very high. In Dewsbury per GP the figure is 1226, in Huddersfield it is 1243 but in **Mirfield it is 3260.**

- 2.4 Mirfield also suffers from its geography and the highways network being inadequate for the demands already being placed upon it.
- 2.5 The part of Site H2089 which falls within the Mirfield boundary (western part of the proposed allocation) represents a serious encroachment into open countryside. The proposed allocation on this western boundary is located on a very prominent hillside which can be seen from the surrounding area, this means that such an allocation would have a significant impact on the open countryside.
- 2.6 There appear to be more appropriate “rounding offs” of this proposed allocation than encroaching in to this western area. The proposed allocation does not follow any natural barriers and seems solely to be based on landownership. The western part of this allocation does not therefore seem to be the most appropriate and we do not consider that there has been sufficient consideration of all reasonable alternatives; indeed we can see no such assessment.
- 2.7 Save Mirfield considers that the Local Plan and supporting documents prepared by the Council and the developer relating to the proposed Dewsbury Riverside allocation fail to demonstrate the timely provision of appropriate highway infrastructure to provide safely and adequately for future traffic and mitigate the impact of the proposed development.
- 2.8 The traffic analysis of site access arrangements and off-site impacts is lacking in detail and insufficient information is provided regarding the procurement and delivery of mitigation measures, in particular the potential requirement of third party land and how acquisition of such land.

### 3. RESPONSE TO INSPECTORS QUESTIONS

Save Mirfield's response to questions raised by the Inspector are set out below:

**a) The Access Statement Technical Note (SS14) identifies a need for four access points into the site. What is the estimated dwelling capacity that could be served from each of these points? How is this capacity reflected in the phasing plan and housing trajectory? Has necessary third party land been secured?**

3.1 Save Mirfield awaits with interest the developers' response to this question. The current Masterplan however proposes 50 dwellings off Sands Lane, Mirfield. Save Mirfield considers Sands Lane to be unsuitable for any intensification of use, due to the poor standard of the access route, including the single-track traffic signal controlled river bridge. Save Mirfield considers therefore that the Masterplan should be revised, deleting vehicular access to Sands Lane.

***b) The Technical Note and Delivery Framework identify the need for strategic highway intervention at about the 2000th dwelling, with one solution being the provision of a new bridge and strategic highway through the site.***

***i. How would the new strategic road link into the scheme, and has a potential route been incorporated into the master planning work?***

***ii. How would the strategic road link be funded, and what effect would it have on the viability of the development scheme?***

***iii. Are other potential options being investigated?***

3.2 Save Mirfield is concerned at the lack of clarity regarding the function of the strategic intervention, which as described by the developer would provide access to the development but would be of little strategic benefit in terms of operation of the A644 corridor.

3.3 The lack of ownership of the strategic intervention is also a concern. The developer alludes to a strategic intervention but without making a commitment to delivery. There is also no reference to such a scheme in the Council's documents.

3.4 The strategic intervention is likely to affect significant areas of land in third party ownership. Further information is required regarding the acquisition of such land.

3.5 Save Mirfield considers that a strategic intervention is likely to be required at an earlier stage having regard to the sensitivity of local traffic and road safety issues, rather than after 2000 dwellings towards the end of the Local Plan period.

**c) At what stage would improvements to Ravensthorpe station be required? What would these improvements involve and how would they be delivered/funded?**

3.6 Save Mirfield considers that the sustainability of the Dewsbury Riverside allocation relies on the provision of convenient public transport. The Local Plan documents and those submitted in support of the Dewsbury Riverside allocation however provide a lack of clarity regarding the delivery of bus and rail facilities.

3.7 The Dewsbury Riverside Delivery Framework alludes to the potential for rail travel to destinations such as Leeds and Huddersfield and development of a strategy that will encourage travel by rail and by bus, The Delivery Framework refers specifically to measures which could be provided to promote rail travel from Ravensthorpe station, listed below which Save Mirfield consider should be provided during the early stages of implementation:

- Bus linkages between the site and the station;
- Improved access and environmental enhancements to the approach road;
- Improved waiting and information facilities.

**d) Should the proposal clearly specify the number/location of access points required and highways/transport infrastructure requirements?**

3.8 Yes. The proposal should indicate and justify the number and location of proposed access points prior to allocation to enable local people to make informed comments.

3.9 Save Mirfield is concerned generally about the lack of detail provided in relation to mitigation requirements and are yet to be convinced that a suitable package of measures has been identified. Save Mirfield consider the site should not be allocated for development until the traffic analysis and plans indicating mitigation measures have been provided for public scrutiny, with details of third party land requirements and the means of acquiring such land clearly indicated.

3.10 Questions – (e)(f) (g) Save Mirfield has no comments on these matters

***h) Have constraints relating to air quality, noise, contamination and land stability been satisfactorily investigated and addressed? Are related mitigation measures and requirements clearly expressed in the Plan? How have these constraints and measures impacted on the viability of the scheme?***

3.11 In the Kirklees Council Air Quality Progress Report 2010/11 Mirfield is identified as being at risk from air pollution due to increased traffic and its location. The allocation of this site in its entirety would therefore add to the air pollution in Mirfield and this would have an adverse effect on the local and natural environment contrary to the NPPF.

3.12 Question (j) Save Mirfield has no comments on these matters

***k) What effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Dewsbury and Thornhill be affected? Are there exceptional circumstances that justify altering the Green Belt? Is there evidence to demonstrate that the section of the site likely to come forward beyond 2031 would be justified and needed to meet housing requirements in the longer term?***

3.13 As set out above the part of the site within the Mirfield boundary is currently Green Belt land.

3.14 The Green Belt in this location is narrow. The draft Local Plan acknowledged that there is are *“narrow green belt gaps separating some settlements particularly around Mirfield.”*

3.15 This area of Green Belt is already very fragile and if it is further eroded communities will cease to exist. This is not acceptable.

3.16 This land continues to serve a purpose as Green Belt land in accordance with paragraph 80 of the NPPF. As such the land should only be removed from the Green Belt if the Council can demonstrate that there are exceptional circumstances as to why this land should be removed from the Green Belt.

3.17 Paragraph 79 of the NPPF provides:

*“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*

3.18 Paragraph 80 of the NPPF goes on to state:

- *to check the unrestricted sprawl of large built-up areas;*
  - *to prevent neighbouring towns merging into one another;*
  - *to assist in safeguarding the countryside from encroachment;*
  - *to preserve the setting and special character of historic towns; and*
  - *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

3.19 The area of land keeps in check the unrestricted sprawl of Ravensthorpe, Dewsbury and Mirfield. It prevents these neighbouring towns from merging in to one another and it safeguards the countryside from encroachment. The land therefore serves a Green Belt purpose

3.20 The Council has failed to demonstrate any exceptional circumstances to justify the removal of this land from the Green Belt and therefore the land should remain designated as Green Belt in accordance with the NPPF.

3.21 The Council appears to suggest that the need to meet housing requirements is a sufficient exceptional circumstance. However, we do not consider that this figure represents an objectively assessed need as required by the NPPF and as it is theoretical it cannot be considered sufficient to justify the release of large areas of Green Belt land.

3.22 The Green Belt is a finite resource and should be preserved as far as possible.

## **4. TRAFFIC RELATED ISSUES**

### **Existing Traffic Conditions**

- 4.1 Traffic flows in the A644 corridor through Mirfield and Ravensthorpe are currently close to capacity throughout much of the day, with traffic congestion evident for long periods. Drivers entering or leaving the main road regularly experience significant delays, leading to driver frustration and a heightened risk of accidents. The presence of large volumes of traffic on the main road also leads to undesirable community severance within Mirfield and Ravensthorpe and prejudicing the free movement and safety of pedestrians.

### **The Proposed Development**

- 4.2 Save Mirfield considers that the proposal for access via Sands Lane should be deleted as the access route, including the single-track traffic signal controlled river bridge, is unsuitable for any intensification of use. With regard to access via a continuation of Forge Lane (2), no details are provided in the Access Statement and land outside the site boundary shown in the Masterplan would be required. Clarification is therefore sought regarding the delivery of this site access.
- 4.3 The Masterplan indicates the potential for additional access to A644 Huddersfield Road via Low Mill Lane, by means of a new bridge over the River Calder and the adjacent railway potentially as part of a strategic intervention (Dewsbury Riverside Strategic Route) which the Delivery Framework indicates could also incorporate a road link to Dewsbury town centre via Forge Lane and Savile Road. It is clear from the Masterplan that the planned new connection to Huddersfield Road affects significant areas of land beyond the site boundary with no indication in the submitted documents that the land required is available to deliver this infrastructure.



## Mitigation Measures

4.4 The submitted Delivery Framework (SS14) recognises the need for mitigation measures at 18 locations in the Dewsbury, Mirfield, Ravensthorpe and Thornhill areas at various stages of implementation of the Dewsbury Riverside proposals, listed below:

1. A644/Calder Road Ravensthorpe gyratory
2. A644/Steanard Lane
3. A644/Church Lane, Mirfield
4. A644/Station Road/Queen Street, Mirfield
5. Forge Lane/Savile Road/Thornhill Road mini roundabouts
6. Forge Lane/Ravensthorpe Road
7. Brewery Lane/Lees Hall Road
8. Savile Road/Mill Street East/Mill Street West
9. Savile Road/Headfield Road
10. Slaithwaite Road/Headfield Road
11. B6409 Savile Road/Dewsbury Ring Road
12. Slaithwaite Road/Lees Hall Road
13. A644/Temple Road/Thornhill Road
14. A644/Low Mill Lane/Fir Avenue
15. A644/Cemetery Road
16. A644/A638 Dewsbury Ring Road/Mill Street West
17. A638 Dewsbury Ring Road/Wakefield Rd
18. A638 Dewsbury Ring Road/Bradford Rd

4.5 Save Mirfield is concerned at the lack of clarity in the SS14 documents regarding necessary mitigation measures. There is merely a list of locations at which mitigation is required, with no plans or details of the measures considered necessary and no supporting traffic analysis. There is also no indication of whether third party land would be required. Save Mirfield consider the site should not be allocated for development until details of the necessary mitigation measures have been provided for public scrutiny.

4.6 The submitted proposals envisage a development of 2310 dwellings on the proposed allocation site within the Local Plan period. A residential development of this scale would typically generate around 1150 additional vehicle movements per hour during morning and evening peak periods (at a trip rate of 0.5 vehicle movements per dwelling)<sup>1</sup>.

4.7 Reference to the traffic distribution indicated in the Transport Assessments produced in connection with the consented developments within the allocation site off Lees Hall Road (2016/94117) and Ravensthorpe Road (2016/94117) indicate 37% of additional traffic movements would be to and from locations to the west of the allocation site, via the A644 corridor. For a development of 2310 dwellings, this would equate to 425 additional vehicle movements per hour during peak periods in the A644 corridor to the west of the site. Save Mirfield however remain to be convinced that this volume of additional traffic can be safely and adequately accommodated at key junctions in the A644 corridor to the west of the site.

4.8 The submitted Access Statement asserts (in paragraph 7) that 2,000 dwellings at Dewsbury Riverside could be occupied before a strategic highway intervention is required. Save Mirfield however consider in view of the sensitivity of local traffic and road safety issues, that a strategic intervention is likely to be required at a much earlier stage. A residential development of 2000 dwellings would typically generate around 1000 additional vehicle movements per hour during morning and evening peak periods. Based on the traffic distribution used in connection with the identified consented developments, prior to the strategic highway intervention 37% of these additional peak hour traffic movements (370 vehicle movements per hour) would take place via Calder Road and A644 Huddersfield Road

4.9 The Council's Infrastructure Delivery Plan Addendum (Document LE40.1) includes proposals for improvement of the Ravensthorpe Gyratory with the submitted Access Statement also recognising the need for mitigation measures. Details of proposed improvements at the Ravensthorpe Gyratory have yet to be provided and it is notable that there is only limited potential to increase highway capacity without acquisition of third party land. Save Mirfield therefore remain to be convinced that the additional traffic generated by development of up to 2000 dwellings could be accommodated at the Ravensthorpe Gyratory.

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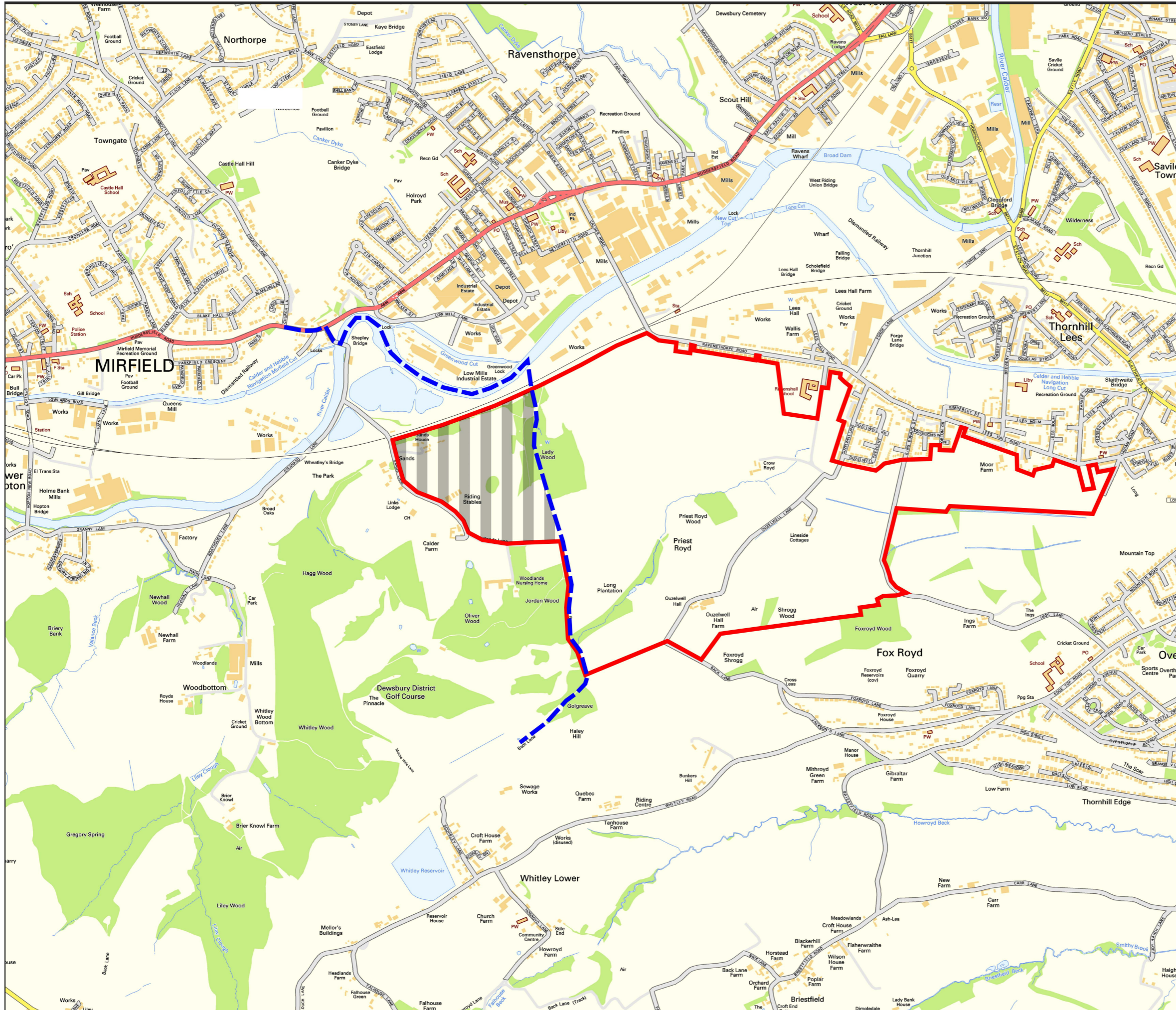
## Dewsbury Riverside Strategic Route




- 4.10 The submitted Delivery Framework and Masterplan (SS14) make reference to a strategic highway intervention which could form part of a Dewsbury Riverside Strategic Route (DRSR). The scheme is alluded to in Delivery Framework and Masterplan however there is no commitment to implement such a scheme either by the developer or the Council.
- 4.11 The submitted Masterplan indicates a potential new road link to the A644. Paragraph 7 of the Access Statement refers to the scheme as 'one option' for a strategic intervention with paragraph 10 referring to various procurement and delivery options (public sector, private sector or joint venture). The Council's documents including the draft Local Plan and Infrastructure Delivery Plan and Addendum however make no reference to the DRSR or equivalent scheme.
- 4.12 Save Mirfield is concerned at the lack of clarity and ownership of the DRSR proposal. Save Mirfield also seek clarification regarding the role and function the scheme. The DRSR as described in the SS14 documents would function primarily as a site access route with little strategic benefit in terms of operation of the A644 corridor.

## 5. Overall Conclusion

- 5.1 Having regard to the severity and extent of existing traffic related problems in the A644 corridor, the major demands for movement that would be generated by the proposed Dewsbury Riverside allocation and the lack of clarity regarding the effectiveness of the identified mitigation measures and the strategic highway intervention Save Mirfield are yet to be convinced that appropriate highway infrastructure will be available to safely and adequately accommodate future demands. Save Mirfield therefore consider the site should not be allocated for development until details of the traffic analysis and proposed mitigation measures have been provided for public scrutiny, with details third party land requirements and the means of acquiring such land clearly indicated
- 5.2 The part of Site H2089 which falls within the Mirfield boundary (western part of the proposed allocation) represents a serious encroachment into open countryside. The proposed allocation on this western boundary is located on a very prominent hillside which can be seen from the surrounding area, this means that such an allocation would have a significant impact on the open countryside.
- 5.3 The part of the Site which falls within the Mirfield boundary is also Green Belt land and it continues to serve a purpose as Green Belt in accordance with paragraph 80 of the NPPF. "The proposed allocation would significantly erode the existing gap between the urban settlements of Dewsbury and Mirfield. As a result it would fundamentally at odds with two of the purposes of including land in the green belt as follows:
- checking the unrestricted sprawl of large built-up areas;
  - preventing neighbouring towns merging into one another.
- 5.4 Exceptional circumstances as required in the NPPF have not been demonstrated and therefore proposed allocation is therefore not justified."
- 5.5 The Council has failed to demonstrate any exceptional circumstances to justify the removal of this land from the Green Belt and therefore the land which forms part of this proposed allocation and which is within the Mirfield boundary should remain designated as Green Belt in accordance with the NPPF.

5.6 There are more appropriate “rounding offs” of this proposed allocation than encroaching in to this western area. The proposed allocation does not follow any natural barriers and seems solely to be based on landownership. The western part of this allocation does not therefore seem to be the most appropriate and we do not consider that there has been sufficient consideration of all reasonable alternatives, indeed we can see no such assessment.



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 Extent of Dewsbury Riverside Site Within Mirfield
  
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 Mirfield Boundary (from KMC Mapping)
  
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 Extent of Dewsbury Riverside Site (from Submitted Masterplan)