

Kirklees Local Plan

Examination Stage 4 Hearings

Site Allocations Dewsbury and Mirfield Sub-Area

Matter 34

Vernon Property LLP

1. **Issue**

Are the proposed Green Belt release housing and mixed use allocations in Dewsbury and Mirfield Sub-Area justified, effective, developable/deliverable and in line with National Policy.

MX1905 – Land East of Leeds Road, Dewsbury – Chidswell

- a) **What is the relationship between sites MX1905 and MX3394? Is access between the sites achievable given the Public Rights of Way along the south-eastern and northern boundaries of MX3394?**

We are unable to comment on this question, but this needs to be demonstrated by the landowner/promoter/developer.

- b) **How was the proposed mix of uses and the amount of dwellings/employment floorspace determined? Is there evidence that this mix is viable and deliverable? Should the Plan provide clearer details regarding the type/form of employment floorspace anticipated on MX1905, as set out in Table 3.2 of Interim Transport Assessment Scoping Note 2016 (SS13)?**

We do not consider that these uses are viable and deliverable. We have seen no basic viability information which suggests that such a scheme is viable in this location.

- c) **How does allocation MX1905 fit with the Leeds City Region Strategic Economic Plan and the Kirklees Economic Strategy?**

We have seen no evidence that it does fit into this plan, and despite the Council arguing that it has complied with its Duty to Cooperate this is a perfect example that it has not done in reality, and there is no joined up thinking. In fact both areas have treated each other as they do not really exist, with many areas of Kirklees likely to see outmigration and commuting to Leeds for employment, yet there is no attempt to provide for this in the most sustainable locations that are orientated towards Leeds. This site could be suitably located to meet this need, but its

location and market area means it is at risk of being unviable and therefore undeliverable..

- d) **Should the Plan clearly specify the number/location of access points required and highways/transport infrastructure requirements? Has the necessary third party land been secured for access solutions to MX1905?**

We agree that the access points and infrastructure is essential in order to have an understanding as to whether this site is deliverable in terms of third party land and indeed viability. The lack of information and therefore evidence for this proposal is unsound.

- e) **Does the Plan provide sufficient detail on other infrastructure requirements for site MX1905, including education, open space, other recreation facilities and the provision of a Local Centre? Should the Plan specify the amount of land required for the provision of facilities, along with details of timing/phasing? How and at what stage will provision be made for early years/childcare and secondary education facilities?**

The provision of infrastructure, particularly education is critical as is an understanding of the timing, phasing and in consequence the viability of the proposal.

- f) **Should the proposal provide clearer detail on mitigation required in association with biodiversity and landscaping on site MX1905, including the retention of existing woodland habitats? Has ecological and arboricultural survey work been completed?**

An understanding of the ecological effects of the scheme again is important to understand whether or not this site is sound. A full evaluation of the site is required under the Environmental Impact Regulations 2017.

- g) **Have constraints for site MX1905 relating to air quality, flood risk, drainage, noise, odour, contamination and land stability been satisfactorily investigated and addressed? Are related mitigation measures and requirements clearly expressed in the Plan? How have these constraints/measures impacted on the viability of the scheme?**

Once again, all of these matters require a basic understanding in order to conclude that this is a sound allocation.

- h) **The housing trajectory indicates that 355 dwellings will come forward within five years, with the first units delivered in 2019/20.**

To date no planning application has been submitted. Are the estimated delivery timescales reasonable and justified?

[the Council is requested to provide a detailed delivery programme which sets out phasing information relating to different parts of the sites and timings of key stages, including preparatory work, marketing/appointment of housebuilders/development companies, EIA work if necessary, Section 106 work, other legal and contract work, preparation of outline/full/other applications, planning application determination, discharge of conditions, site preparation, commencement of development. Anticipated timings of key infrastructure delivery should be provided as part of this programme.]

We do not consider that the Trajectory is remotely realistic. Given the work that is needed (as is pointed out in the italicised text to this question) there is an enormous amount of work required before a spade is put in the ground. In our view, as with the other sites, a leading of a minimum of 3 years is achievable with a fair wind.

- i) **What effect would the proposed boundary changes and allocations have on the Green Belt and the purposes of including land within it? In particular, how would the existing gap between Dewsbury and settlements within Wakefield be affected? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?**

Again, we accept that Green Belt is required in order to provide for housing but we consider that other sites are more capable of having less impact on the Green Belt and are viable and deliverable early in the plan.