

Mrs Heather M Allan

I wish to submit my representation against the Kirklees Local Plan, site H591, on the following two criteria in Matters 37 and 39 for housing in Gomersal and the needs for Gomersal specified below.

Matter 37 – Are the proposed Green Belt release housing allocations in the Spen Sub Area justified, effective, developable/deliverable and consistent with local policy

General

- (a) is the site suitable for the proposed use? Does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures.**
- (b) Is the indicative site capacity appropriate, taking account of constraints and the provision of the necessary infrastructure?**
- (d) what effect would the proposed boundary changes and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?**

1. The Sustainable Appraisal Report of the Kirklees Local Plan page 1639 SA Objective 3 states that the plan must ensure education facilities are available to all. By their own formula Kirklees estimate that three primary and preschool places are created per school year per 100 new households plus a further two for secondary school places.

2. H591 will have 135 new households which will require an additional 28 primary and preschool places in Gomersal plus an additional 19 secondary school places.

3. The primary and preschool situation - the two schools in Gomersal are already oversubscribed. Classes are at their maximum of 30 pupils and a new building would be required to accommodate the extra intakes. At the present time, children from Gomersal cannot be accommodated at these local schools. The Local Authority High School and Local Academy servicing Gomersal, Cleckheaton and Birstall are already at or near maximum capacity and the Local Authority School is a new build, where the original school had greater capacity and is no longer used being in the process of being demolished. Kirklees Education Department are reducing the number of school places available to children from Gomersal.

4. On 22.12.17, Kirklees Planning Department (ref 2017/92809) agreed to build 55 dwellings on land on Kenmore Estate. This is in the vicinity of Whitcliffe Mount School which is one of oversubscribed secondary schools serving Gomersal.

5. Gomersal, over the last five years, has already had major and minor housing developments completed or proposed in the area. Within a half mile radius of Site H591 in Gomersal, the following houses have been built or had planning permission granted to build:

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

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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 MACESS, Spen Lane, within 440 yards of the proposed site

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

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

2 houses on Latham Lane (planning consent granted)

The second phase of the public consultation added Gomersal First School land, Oxford Road – to be used as residential accommodation.

6. The former Whiteley's Mill on Spen Lane on the boundary of Gomersal and Cleckheaton is now fully demolished. The site is owned by Tesco who currently wish to sell it for housing. This site is larger than the H 591 site and is more accessible to public transport, local amenities without car movements and education facilities. Utilisation of this brownfield site would allow Kirklees Council to meet its national housing requirements without excessive removal of green belt.

7. There is only one doctor's surgery in Gomersal and no dental surgeries. There are very limited spaces for NHS dental surgery in the Cleckheaton area.

8. It is believed that because of the new overdevelopment within the Cliffe Lane corridor (379 houses), the development at Roundhill Mills site is already experiencing difficulties in sewage disposal, due to the over capacity of the sewage system. If Site H591 is given approval it would add another 135 properties to the Cliffe Lane sewage pipes which cannot cope at the present time.

9. No more houses need to be built in Gomersal, especially taking valuable Green Belt land, when the available schools are already full and local children are now having to travel outside Gomersal to find schools to attend.

Matter 39

(a) are identified access/other constraints i) capable of being resolved and ii) unlikely to be resolved until 20131 or beyond.

(c) in the case of sites currently in the Green Belt, what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt in this location.

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.

Site H591 does not meet the two criteria list above from, so I suggest that the Plan is not sound due to the following points in the EXAMINATION GUIDANCE NOTE - July 2017 (v.1) item 5 point 3.

1. I submit that Gomersal is already overpopulated 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, when there are still brownfield sites available for housing use.

2. 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.

3. 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."

4. Even though all these houses have been allowed to be built/or approved in Gomersal adjacent to Site H591, there has been no updating of the highway infrastructure. The proposal from the developers is to narrow Cliffe Lane in order to facilitate the required visibility splay. Cliffe Lane is already over congested, proven by Kirklees Highways Department traffic surveys: an average of 1737 vehicles per day over a 5 month period in 2013/14.

5. The proposals for Site H591, only allow for one means of access and egress from the site, which in my opinion could endanger the residents of the proposed site. It is at this point that Cliffe Lane would be narrowed to achieve the required visibility splay, also endangering road users on Cliffe Lane. Under Kirklees Publication Draft Local Plan – accepted sites: Housing Batley and Spen – under H591- Transport, Kirklees state that the site access is achievable from Cliffe Lane with required visibility splays and that the site promoter has confirmed control over the required land to achieve this. The highway (Cliffe Lane), however, which they want to narrow to achieve the visibility splay, is in the control of the Local Authority.

6. Under Kirklees Publication Draft Local Plan – accepted sites: Housing Batley and Spen – under H591- Flood/Drainage – there are concerns that there is no available option for surface water drainage. The site slopes from east to west and the natural flow of surface water follows this slope and collects in the west, causing flooding in the north west corner of the site. The current landowner created a pond on the western side of this site to collect surface water due to excessive flooding. Existing properties adjacent to H591 already have problems with flooding of gardens due to poor surface water drainage.

7. There are no local jobs for potential residents in Gomersal and therefore it follows that any further house building would be just for commuters and not local people.

8. A proposed developer, who submitted evidence at the first public consultation of the Local Plan, included the need for pile driving to take place on Site H591, because of the topography of the land. I fear that, because of the proximity of known and unknown old mine workings and shafts, this requirement would impact on the existing and proposed properties, due of the disturbance of the mine workings. This area is known to be a high risk coal referral area, Matter 26(f), which Kirklees acknowledge under the accepted site proposal for H591- other constraints.

9. 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. The Green Belt land proposed for Site H591 is prime grazing land.