

# Robert Halstead

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## **Kirklees Local Plan EIP Hearing Statement**

### **Matter 41 – Kirklees Rural Sub-Area (rejected) housing allocations Site ref: H322a – land at Wood Nook / Cumberworth Lane, Denby Dale**

The full details of my client's case for arguing the Local Plan is unsound in respect of being unjustified in its strategy of allocating other areas of Green Belt land ahead of H322a (and adjoining sites H322 & H475), are contained in our submission to the Council at the Publication Draft Stage which comprised a representation pro-forma submitted through the Council's consultation portal.

As the Inspector will already have a copy of this document, I do not intend to fully recite these submission at the hearings. At the time of writing, the MIQ's for rejected housing sites have not been published and therefore, guided by the Inspector, I would like if possible to discuss this case on the basis of the following headings:

- Merits of H322a (in conjunction with H322 & H475) in relation to five key purposes of Green Belt. I will argue that the Council's response that such an allocation would result in an "isolated projection of the development in the countryside" (Ref: EX26 – page 185) is incorrect in my opinion, based on various forms of evidence, including the fact that with existing planning permissions, the sites will be surrounded on three sides by development.
- Comparisons to the release of Green Belt at land to the east and west of Inkerman Way – refs: H233 & H634. Please note I am not seeking to specifically object to these other land allocations; I am simply aiming to ensure the strategy for allocating sites is appropriate and justified in relation to tests of soundness.
- Access.
- Relationship with Urban Greenspace, village centre and public transport.
- Availability & deliverability of H322a.

In my view, the release of H322a for housing development (in conjunction with H322 & H475) is considered to represent a more appropriate strategy when considered against reasonable Green Belt release alternatives.

Proposed modification: allocate H322a (and H322 & H475 subject to agreement with their representatives) for housing development.

**Nicholas Willock MRTPI MRICS**

**3<sup>rd</sup> February 2018**