



Kirklees Local Plan Examination

Stage 4 – Other site allocations

Hearing Statement

**Submitted on behalf of Upper
Dearne Valley Environmental Trust
(registered charity number 1157540)**

Matter 41 – Denby Dale Allocations

January 2018

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Issue – Are the proposed housing and safeguarded land allocations in Denby Dale justified, effective, developable and consistent with national policy?

H3325a – Park Mill, Manor Road, Clayton West

1. The Upper Dearne Valley Environmental Trust has already submitted representations against the proposed allocation of site H3325a and trust that the Inspector has these representations and will take them in to consideration. However, the Upper Dearne Valley Environmental Trust wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Upper Dearne Valley Environmental Trust also wish to speak at the hearing in relation to Matter 41.
2. UDVET have not made site specific representations in relation to the other proposed allocations within Clayton West. However, being considered as part of this matter are 5 housing sites within the village of Clayton West, with a total of 402 dwellings. A note is appended to this statement setting out observations on these proposed allocations and others in the Dearne Valley area where a total of 1300 new houses are proposed, including those already having planning permission. (Appendix 1). UDVET have seen no rational or justification for such large scale and intensive development in such a small geographical area. As raised previously we do not believe that the cumulative effects of all the proposed allocations within this small area have been fully assessed or considered. In this they have agreed with the CPRE position in this area of Clayton West and the Dearne Valley in general.
3. Introduction
 - 3.1 Site H3325a is the current Adare Site at Park Mill, Clayton West. This Site is currently an employment/commercial site and the proposal is to change the site to a housing site. This is totally unjustified given that the Council have identified a need for further employment sites within Kirklees Rural whilst proposing to lose this site to housing. The loss of employment sites to housing is one of the biggest challenges identified by the Council for Kirklees Rural and should not be supported.
4. Question (a)
 - 4.1 Site H3325a is 4.52Ha which is currently in employment use. The Council have identified that 3.10ha of the Site would be deliverable given that part of the Site is within Flood Zone 3. The Council have therefore identified a capacity of 122 dwellings.

- 4.2 This Site is currently an employment site with circa 200 jobs. By losing this employment site there would be a significant negative impact on the economy. The proposed allocation therefore serves no economic role and does not represent sustainable development in accordance with the NPPF.
- 4.3 The Site is not a suitable housing site, it is a suitable employment site.
- 4.4 The Council have identified the following constraints for Site H3325a:
- Public right of way crosses the site
 - Part of the site is within flood zone 3
 - Site contains / is in close proximity to a protected species
 - Site is within the Wildlife Habitat Network
 - Part of this site lies within a UK BAP priority habitat
 - Site is close to listed buildings Site is close to archaeological site
 - Part/all of the site is within a High-Risk Coal Referral Area Flood Zone
- 4.5 Part of Site H3325a is located within Flood Zone 3. We consider that there are significant flooding and drainage issues which need to be fully taken in to consideration before the Site can be taken forward. Part 2 of the plan does not set out sufficient details of mitigation measures and this is unacceptable.
- 4.6 The Site is located within the Wildlife Habitat Network, it contains protected species and part of the Site is a BAP Priority Habitat.
- 4.7 The proposed allocation would fail to conserve or enhance this important ecological site and no mitigation measures appear to have been set out within the Plan.
- 4.8 Part of the Site is within a High-Risk Coal Referral Area and in accordance with the NPPF development which could contribute to land instability should be prevented. Issues of land stability have not been fully assessed to ensure that the Site would be suitable for housing in any event.

5. Question (b)

- 5.1 *The Council have identified that there is 3.1ha of developable land on Site H3325a and they have therefore identified a capacity of 122 dwellings.*
- 5.2 *UDVET have not seen sufficient information/evidence to support this capacity. Insufficient evidence has been provided to show that the capacity is appropriate given the identified constraints and necessary infrastructure.*

6. Question (c)

- 6.1 *UDVET await to see what evidence is presented to show that this site would be available and deliverable as a housing site.*
- 6.2 *According to the submitted phasing schedule housing is due to be delivered every year from 2019 until 2023. UDVET question the deliverability of this given*

that it is already 2018 and the site is still an employment site with considerable constraints for housing and no planning application has been submitted.

7. Question (d)

- 7.1 *Site H3325a is not currently in the green belt (the MIQs seem to suggest that it is). However, the redesignation of this employment site to housing would appear to mean that a green belt site E2333a would need to be removed from green belt to meet the employment needs. This is totally unjustified.*

H3325a – Park Mill, Manor Road, Clayton West

8. Question (i)

- 8.1 UDVET will await to see what information is submitted in response to whether access could be taken off Manor Road.

9. Question (ii)

- 9.1 UDVET will wait to see what information is submitted in response to this question. However, great care must be taken to preserve the Old Pack Horse Bridge.

10. Question (iii)

- 10.1 UDVET consider that development of this site next to the green belt for housing will have an unacceptable negative impact on the character and setting of the village, the river corridor, the listed Packhorse Bridge and the Green Belt.

11. Question (iv)

- 11.1 The Local Plan identifies that one of the major challenges for Kirklees Rural is the loss of employment land to housing. However, they then propose to allocate site H3325a for housing when it is currently in employment/commercial use. This is not justified. Site E2333a is then proposed as a release of Green Belt land for employment purposes and is adjacent to Site H3325a. How can it be justified to release Green Belt land for employment purposes and then allow an existing employment site to be allocated for housing. If there is a need for employment land in this area, then site H3325a should be retained as an employment site to reduce the amount of Green Belt land being lost. This allocation is totally unjustified and cannot be considered to be sound.

12. Conclusion

12.1 UDVET therefore respectfully request that site H3325a is not allocated for housing and is retained as an employment site.

Upper Dearne Valley Environmental Trust (UDVET)

Stage 4 Hearing Statement

Matter 41

Denby Dale Allocations

Clayton West Sites:

Sites H17, H454a, H498 Manor House Farm/Park Mill area - no comment other than we agree with the comments originally made in the CPRE's representation.

According to the Phasing Schedule, housing is due to come on stream:

H17 – 2019

H454a – 2018-2019

H498 – 2019 -2020

We question the rationale and deliverability of this scheduling.

Site H222 – Land North East of Pilling Lane, Scissett (200 dwellings) this site has already been granted pp and the developer moved onto the site (very controversially) just before Christmas. This development was vehemently opposed, originally refused, but later approved by the Council following an unsuccessful defence of an appeal elsewhere in Kirklees (Cleckheaton) and failure to defend an appeal (at Strike Lane, Skelmanthorpe). The developer was allowed to go ahead, despite the appalling access to this 'locked in' site via existing residential roads not constructed to take the amount of traffic which will flow from 200 houses – most of which will have 2/3 cars each. This site will be active for the next 6-8 years and is perceived by UDVET members and local residents as having a substantial negative impact on Scissett and surrounding area.

Site H3325a – Park Mill, Manor Road (122 dwellings)

Strongly object. This site should retain its employment land status to prevent adjoining greenbelt being used for employment. Allocation shows lack of strategic approach.

According to the Phasing Schedule, housing is due to come on stream every year between 2019 and 2023. Again, we question the rational and deliverability of this scheduling.

Site SL2284 – Safeguarded Land Lower Busker Farm, Busker Lane, Scissett.

Object both to the concept of safeguarded land (not needed if comprehensive local planning process to take place) and this site has appallingly dangerous access onto Busker Lane – a very narrow part of the B6116 which is totally unsuitable for the volume of traffic it now has to cope with – traffic queues up Busker Lane from its junction with the A636 at Scissett.

Skelmanthorpe

Site H39a – Land North of Strike Lane (39 Dwellings)

Site H72 – Land off Station Road (44 dwellings)

Site H39a – Land North of Strike Lane (39 dwellings) - location unsuitable for size of proposed development – very narrow lane – and farm access – on-road parking by residents lacking off road parking – leads to Station Road – very busy and again highly congested with parked vehicles on both sides of the road – Station Road/Commercial Road junction narrow and dangerous. Disputes already arisen as a result of the recent development of 26 houses.

According to the Phasing Schedule, housing is due to come on stream every year between 2019 and 2023. Again, we question the rational and deliverability of this scheduling.

Site H72 – Land off Station Road, (44 dwellings) Green Belt release - location unsuitable for size of proposed development and would feed yet more traffic onto Station Road. See comments above and below. Given the amount of development proposed in the Dearne Valley, greenbelt release is not justified in our view.

Station Road is also used by very large multi-axle vehicles to service the industrial units on the so called 'Skelmanthorpe Technology Park' off Station Road. The latter is not a clean, non-warehouse type park as originally specified on the planning application – it contains several warehouse type operations which need to be serviced by large delivery HGV vehicles. These operations are totally unsuitable for the area.

Opposite the above is a development of around 98 flats/ houses built approximately 8-10 years ago on a former coal washing and WW1 munitions site in the face of many local objections. This development has also substantially increased the volume of traffic using Station Road. Overflow of attenuation tanks during heavy rain several years ago contributed to flooding at Park Gate (in the road dip at the northern end of Station Road before it becomes Park Lane to Emley).

According to the Phasing Schedule, housing is due to come on stream every year between 2018 and 2019. Again, we question the rational and deliverability of this scheduling.

Site H502 – Land South of Huddersfield Road (203 dwellings)

Object to greenbelt release. This is unnecessary given the volume of development proposed in the Dearne Valley. We have serious concerns about the size and scale of the planned development and volume of traffic which will be released into the area by such a large development. Whatever access arrangements are put in place, it will ultimately throw more traffic onto the B6116, A636 and A629 affecting Skelmanthorpe, Scissett, Clayton West,

Shelley, Kirkburton and volume of traffic flowing into Huddersfield on the A629 (which will already be affected by other proposed housing allocations along its length and feeder roads).

If this site goes ahead, it will need to be Masterplanned with genuine early engagement of the community to ensure it delivers the type and tenure of housing really needed in the Dearne Valley area, urban green space areas and possibly shops.

The B6116 is already a high accident route and is signed as such. At one time this road also carried a weight limit but this seems to have disappeared over time. We believe one of the reasons for the weight limit was the fact that the B6116 is banked above Elm Street (the original road through Skelmanthorpe and the old road to York). The banking did collapse in the 1930's and had to be extensively rebuilt although a section of the original 1850 construction appears to remain. Currently, there appears to be a drainage issue with the B6116 which has the potential to create a sink hole in the road on this banked section. The road is in poor condition through Skelmanthorpe.

According to the Phasing Schedule, housing is due to come on stream every year between 2019 and 2022. Again, we question the rational and deliverability of this scheduling.

Site H688 – Land North of Commercial Road (88 dwellings)

This site, adjoining the central conservation area in Skelmanthorpe has also been given planning permission despite local objections and the developer is currently on site. UDNET raised objections to the type and tenure of housing proposed, increased volumes of traffic on the B6116 which we believe is operating near or at its maximum capacity now and raised concerns about planned drainage regimes.

Site H768 – Land west of Willow Close

No comment.

Denby Dale

Site H1784 – Lane East of Denby Dale Railway Station, Station Road (19 dwellings)

Object to this allocation for housing. This is currently an employment site operating as a building supplies yard. Given the Council's stated transport strategy to get people using public transport and the need to improve parking on the Penistone Line, we believe that at least part of this site should be preserved for station car parking of which there is very little at present. We feel demand and train usage would significantly increase if this were provided, taking traffic off the local road network for commuter journeys into Huddersfield and South Yorkshire. People need to use a car or bicycle to access stations when living in scattered rural communities. Easily accessible and secure parking is critical.

It does not make strategic planning sense to allow this land to be used entirely for housing. We would prefer to see a combined employment/station parking facility established here.

According to the Phasing Schedule, housing is due to come on stream every year between 2018 and 2019. Again, we question the rational and deliverability of this scheduling.

Please note: Poor parking arrangements also exist at Shepley Station on the same route. Improvements could also be made at Stocksmoor.

We would like the Council to fully explain its rationale and justification for such large scale and intensive development in such a relatively small geographical area. Where's the evidence that the impact on the area will not be totally unsustainable?

23 January, 2018