

## KIRKLEES LOCAL PLAN EXAMINATION

### Matter 8 – Approach to site allocations and Green Belt release

**Has the council undertaken a comprehensive assessment of development capacity within existing urban areas and other areas outside the current Green Belt?**

**Sites H2684a and H2730a**

**Sustainability Appraisal ( Comment: PDLP AD421)**

#### **Use of brownfield sites**

Whilst Kirklees state that they “seek to encourage the use of brownfield sites.” In nearby Kirkheaton there is a large former mill site (Broadhead & Graves), in the centre of the village that has stood empty for many years. It is an eyesore. In addition there is an even larger mill site in nearby Dalton (Jarmains) again untouched. Why haven't Kirklees done anything to encourage building here instead of on greenbelt?

No doubt there are many such sites across Kirklees. Builders much prefer building on fields rather than brownfield land as it is probably more profitable. Kirklees response to my comment is that “they are encouraged to develop brownfield land through applying PLP7 & PLP3”. The evidence I have seen locally is that these are weasel words. I am also now advised that Kirklees **do not** have a comprehensive register of all brownfield sites. Thus they are not properly discharging their duties in respect of the assessment of development capacity in within urban areas

#### **Education-provision of school places**

The Council's conclusion in their SA analysis for H2684a and H2730 are puzzling. They state that the “cumulative SA analysis effects on specific villages has not been separated out as the effects of allocating sites at any specific settlement will not be entirely separate from other allocations on the plan.” In assessing the Education provision analysis for two large sites this is most certainly neither robust nor comprehensive

Surely building over 800 houses in one village should be analysed as a whole whatever is happening at other locations across Kirklees. Though to complicate matters further, perhaps H1679 across the other side of Penistone Road from Fenay Bridge where 274 houses are planned should also be taken into account.

Furthermore, Kirklees response to my submission goes on to say “that capacity issues may result and that has been acknowledged by adding uncertainty to the scores recorded. Then why is the Education SA for the Lepton site coloured GREEN? It should be RED

The Kirklees comment on my submission is that the plan makes provision for new schools and additional places through PLP49 and PLP4. There isn't any mention of this within the “Accepted Site Options Technical Appraisals” that this may be required. Had Kirklees chosen to liaise with the local community this issue would have been highlighted.

Again I am concerned that the quoting of PLP policies are weasel words. Were these policies used to look at school places around Lindley/Laund Hill where the two nearest schools to the large new housing estates are full? I understand that there have been problems.

## **Transport**

The SA Technical Appraisal states that Kirklees are sceptical that the proposed 300 dwellings can be accessed from Hermitage Park. As can be expected, the developer's consultants say that with a bit of tweaking it would be fine. Sandersons Consultants, employed by Farnley Estates for H2684a conclude Hermitage Park access is a suitable for 45 houses. Any inspection by most drivers would conclude similarly. There isn't an apparently obvious alternative route out from H2730 into Rowley Lane. The SA should be coloured RED

Regretfully many people in Huddersfield commute out of town as there aren't sufficient or at least well paid jobs nearby. Most people who would come to live here would commute to other locations mainly in the West Riding. They would have to drive there or park at a railway station. A recent Kirklees survey found that nearly 5000 vehicles use Rowley Lane every working day. Additionally development of housing sites in Kirkburton, Highburton and the Dearne Valley will inevitably result in more traffic on the Penistone and Wakefield Roads and add to the difficulty for people in Lepton or Fenay Bridge trying to join them. How Heat mapping results in an SA coloured GREEN with a significant positive effect is baffling to me and probably to most people

## **Protecting the countryside from encroachment**

The Council's response to my concerns on their plans to build on H2730 & H2684a states "there is little risk of further encroachment". I disagree, this "large" site is clearly a huge encroachment toward the village of Highburton, that is obvious on any map or plan and when viewed from Highburton

## **Green Belt**

Kirklees Local Plan for these sites is to ignore their earlier decision and that of the Government Inspector to keep the fields alongside Lepton Great Wood (LGW) as Greenbelt. The conclusion of the Inspector at that time was that designating the field alongside LGW would "protect the countryside from encroachment.

Clearly this was identified as a key Greenbelt edge. Possibly due to pressure from developers, Kirklees now say that a buffer zone between the housing estate and LGW is sufficient. Houses on Great Wood Gardens that back onto LGW use it as a tip; there is little doubt that any buffer zone would be put to similarly use. This decision is illogical.

Common sense indicates that building a housing estate along the whole length of LGW will have a considerable effect on flora and fauna. The effect of a housing estate built alongside Fellgreave wood at Brackenhall has effectively moved that wood into an urban area. There would be a similar effect on LGW and its setting with views across to the Woodsome Valley and to Castle Hill would be blocked out by the housing estate.

To fully understand the harm that would be done to the countryside and Lepton Great Wood in particular is to take a walk through the wood

## **Conclusions**

**Kirklees approach to site locations and building on Green Belt is unsound because:**

1. Their decision to redefine the Greenbelt edge for H2730 & H2684a, appear to be based on the fact that the developer wants to build there. Rather than an overall assessment of where imperative greenbelt incursions would cause the least harm.
2. They are not applying the relevant codes of practice to maximise the use of brownfield sites. Large local derelict mill sites in urban areas nearer Huddersfield have stood empty for many years. It is also understood the Council do not have a comprehensive brownfield site register
3. Key SA conclusions for Sites H2730 & H2684a are incorrect.

**Gerald Newsome**