

**DATA PRIVACY INSTRUCTION – ALL PERSONAL IDENTIFICATION DETAILS MUST BE REDACTED
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Mr P Oldfield
(On behalf of:
Fixby Residents Organisation)

3rd Sept 2017

Kirklees Local Plan – Stage 1 Initial Hearings

MIQ8 - Key Points for Consideration

Matter 8 – Approach to site allocations and Green Belt release

Issue – Is the Plan’s approach to identifying site allocations, safeguarded land and Green Belt releases soundly based and in line with national policy?

Challenges & Objections:

- There is no evidence of the Council’s stated strategic objectives being rigorously tested and consistently applied across all areas of Kirklees and the proposed house building plans in the North Huddersfield/Fixby area are directly at odds with 4 of the 10 stated objectives (referenced below).
- There is no evidence of clear plans to fully reuse or recycle existing brownfield sites prior to any Green Belt destruction.
- The use of Green Belt to accommodate 11,500 of the target 31,140 dwelling seems disproportionate and is particular so in the North Huddersfield/Fixby area.
- The Fixby issues are exacerbated by the new house building plans in the adjoining Calderdale/Brighouse area and will see the ‘spatial buffer’ virtually eliminated. This point has already been identified in the Matter 8 summary notes with reference to: What extent has the process of assessing Green Belt sites taken account of the extent of remaining gaps between different settlements and the maintenance of separate settlement identity, and emerging proposals in neighbouring authorities that would reduce these gaps? The evident lack of discussion between Kirklees/Calderdale and/or evident lack of consideration to local needs and upholding of the strategic commitments is clear and must be addressed.
- The selection and proposed use of site H519 (Fixby) is at odds with the stated purpose of the Green Belt as a buffer against uncontrolled urban sprawl and Kirklees’ commitments via the stated strategic objectives. We can only assume that this site is opportunistic for both land owner and Council and has not been selected through adherence to the Plan principles.
- The Kirklees Local Plan has been anchored around 10 strategic objectives and all local resident responses have been based upon these commitments being upheld via the Plan. 4 of the 10 objectives are directly contradicted by the new house building proposals in the Fixby area:
 1. Protect and improve green infrastructure
 2. Provide access to good quality open spaces and opportunities for sport, recreation and play.

3. Protect and enhance the characteristics of the built, natural and historic environment and local distinctiveness.
4. Promote the use of brownfield land.

Minimum expectations:

- Evidence of plans to fully use available brownfield sites prior to the destruction of Green Belt land must be provided.
- The percentage Green Belt test must be applied across individual regions within Kirklees. The disproportionate Green Belt allocation in the Fixby area cannot be justified against maintaining Green Belt land elsewhere (the purpose and benefits of the Green Belt applies across all communities).
- Evidence of discussions with Calderdale must be provided together with evidence of material plan adjustments to ensure the combined effect of both council's building plans does not compromise stated objectives.
- On the basis that these material plan adjustments cannot possibly have been made, the proposed house building plans and Green Belt destruction in the Fixby area needs a complete re-think and further local resident consultation.
- The selection of site H519/Fixby should be reviewed and the need to use/appropriateness of the site must be tested against essential demand needs and adherence to the Council's stated strategic objectives.

Regards

Paul Oldfield

(On behalf of Fixby Residents Organisation)