

HOLME VALLEY PARISH COUNCIL

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Mr Richard Hollinson
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By email: local.development@kirklees.gov.uk

Dear Mr Hollinson

KIRKLEES DRAFT LOCAL PLAN

I am authorised by Holme Valley Parish Council to submit its formal comment on the Kirklees draft Local Plan. Following extensive community engagement earlier in the year (prior to the previous Kirklees consultation) and from engaging with Valley residents more recently, the Council's Planning Committee considered the draft Local Plan at a meeting on 12 December 2016. The Council's comment is as follows:

Introduction

The Parish Council recognises the need for development across Kirklees, including the Holme Valley, but is concerned that the proposed level of development will damage the character of our area.

In developing its Local Plan, Kirklees Council has made the strategic decision to combine the Holme and Colne Valleys along with Denby Dale and Kirkburton areas into one group, Kirklees Rural. In doing so, the individual identities and characteristics of these areas will be ignored. Each of these areas are different, being defined by their economic and social history, their topography and their geographical location within the District of Kirklees.

Local Services including Education

There is no analysis of the allocation of new housing or the provision of local services in the Holme Valley.

Unfortunately, because the Holme Valley has been amalgamated into Kirklees Rural it has been assumed that because there may be spare provision of services within Kirklees Rural then that spare capacity must occur evenly throughout Kirklees Rural. This is not the case.

Local schools within the Holme Valley, for example, are at capacity and large residential proposals such as the one at Scholes make no reference to expanding provision, despite this clearly being essential if such a development is to be viable. It will be no comfort to new residents to learn that although there are school vacancies within Kirklees Rural, there are none in the Holme Valley.

Transport Infrastructure

Highways infrastructure is tightly constrained by the topography of the Holme Valley and there is no recognition in the Local Plan of the narrow lanes, traffic congestion and need to improve junctions such as in the centre of New Mill or Holmfirth, if more cars are to travel through these areas.

Our historic heritage of agriculture and textiles has created a network of small roads which are ill-suited to extensive development and the associated parking problems which are particularly visible on the Woodhead Road.

A more realistic acceptance of the car growth and parking needs associated with any residential development should be more explicit in the Local Plan.

The traffic lights in Holmfirth are recognised as a congestion point, but no resources or timescale are assigned to resolving the problem. The junction of the A616 at New Mill, previously recognised as a congestion point, is ignored altogether.

There are no transport mitigation strategies within the Local Plan for the Holme Valley area to offset the increased transport requirements resulting from the allocation of new housing and commercial activities.

Whilst we welcome the proposed new cycle and walking route through the Holme Valley and hope this will build on the work of River 2015 in utilising the river corridor for a flatter and more accessible route, non-vehicular transport opportunities are limited by topography.

The Economy

The Local Plan is primarily focused on creating manufacturing and engineering excellence. Historically the main industries in the Holme Valley have been agriculture and textiles; sadly little is left of our textile heritage. Whilst there are a number of manufacturing and engineering companies located in the Valley, their ability to grow is limited by poor infrastructure, especially transport which impacts on their ability to get goods to market.

The economic strategy suggests an evolutionary improvement for Holmfirth, but there is no strategy to encourage any growth. The lack of industrial/office space, infrastructure and the poor transport links are not addressed.

There is no focus within the economic strategy on the service sector, especially the creative industries and professional services. With its higher than average per capita income levels, a large proportion of the local population is employed in these areas. With the lack of provision for offices and smaller units within the Holme Valley, the majority of these professional workers will end up commuting to the regional powerhouses of Leeds, Manchester and Sheffield for work, the danger being that the Holme Valley just becomes part of a commuter belt rather than becoming a dynamic economic area in its own right.

Appropriate & Affordable Housing

Within Kirklees Rural - West, there is a significant need for affordable 1-2 bedroom housing, as well as a need for 1-2 bedroom housing for older people specifically. Kirklees Rural - West has some of the highest priced housing in Kirklees with properties costing around £105,000 to £195,000. It is a popular location, with 15% of households planning to move home within Kirklees in the next 5 years, having it as their first choice destination.

Kirklees Rural - West has a large number of detached properties, compared to other areas in Kirklees and a high level of home ownership, with 75% of houses being owner-occupied. Around 15% of homes are private rented and around 10% are affordable (social) homes. Affordable bungalow and 1 bed/bedsit homes are limited in availability in the area. Kirklees Rural - West has some of the highest rents in Kirklees, starting from around £425+ per month.

Current Kirklees Council guidelines specify that Kirklees Council aspires to secure 15% of the development floor-space for affordable housing on brownfield sites, and 30% of the development floor-space for affordable housing on greenfield sites. Kirklees Council is due to consider implementing an interim affordable housing policy that reflects the policy in the current draft Local Plan. The current draft Local Plan advises that the Council seeks to secure at least 20% of total units on market housing sites with over 11 or more dwellings, for affordable housing. With a need for affordable housing in the Valley, this affordable housing policy is welcomed by the Parish Council.

We urge Kirklees Council to engage with the Parish Council and our community in greater discussions about brownfield sites or your identified rejected sites which would offer opportunities to secure small scale expansion of our towns and villages without damaging their unique characters. The Holme Valley is an area of economic importance in its own right, not just a source of commuters to Leeds and the other city regions. It is typified by small local businesses in the creative and service sectors and these need small sites to grow from, not large scale industrial developments. An example of this is Bridge Mills which currently houses a number of local businesses and yet in the Local Plan is proposed for residential development.

Historic Environment (Policy PLP35)

Holmfirth itself is a honeypot in Kirklees with its range of cultural attractions and beautiful Pennine scenery; the importance to growing the tourist economy and the service sector is not recognised in the Local Plan.

The NPPF places a duty on local planning authorities to set out a positive strategy within their Local Plans 'for the conservation and enjoyment of the historic environment, including heritage assets most at risk'. It goes on to define a conservation area as a designated heritage asset. Of the 4 conservation areas listed as 'at risk' by Heritage England only 2 have had conservation area appraisals. There are 60 conservation areas within Kirklees, only 21 of these have had conservation area appraisals completed.

Holmfirth Conservation Area is on Heritage England's 'At Risk Register' and its status is 'in decline' and has not had an appraisal. As you will be aware, the Parish Council has started to develop a Neighbourhood Plan for the Valley and this gap is an area we wish to see addressed.

Kirklees's Draft Local Plan states 'Development proposals affecting a designated heritage asset should conserve those elements which contribute to its significance' (PLP 35.1) and 'ensure that proposals within conservation areas conserve those elements which have been identified as contributing to their significance in the relevant Conservation Area Appraisal' (PLP 35.3(b)). Without a Conservation Area Appraisal, which identifies the characteristics of a conservation area that contribute to its significance, these policies will be difficult, if not impossible, to implement.

Greenfield and Green Belt needed for Food Security

Greenfield and Green Belt land will become increasingly in demand in the future for food and livestock to feed our growing population (both UK and local) so if imported food becomes more difficult to source through demand and price, we need to safeguard our greenfield and Green Belt land banks.

Looking at the bigger picture, it is paramount that Kirklees Council limits the amount of greenfield and Green Belt land for building, in favour of brownfield sites; this is especially the case in the Holme Valley where the demand for local produce, from local farmers, is increasing.

Producing and eating local food and the need to establish a secure food supply are key to reducing the carbon footprint and contributing towards slowing down climate change. Increasingly, people want more control over where their food is grown, reared or made; Kirklees Council must include such environmental considerations in the Local Plan.

Objections to Specific Sites

The Parish Council appreciates the challenges of providing for growth across Kirklees but following its community consultation, wishes to specifically object to the current residential proposals made at Scholes, Cinderhills and Holmbridge and the quarrying proposals in Honley. The following pages detail our concerns about these sites in more detail. We welcome the opportunity to discuss these sites and others across the area with you as you consider the feedback you have received on the Local Plan. As the grassroots level of local government, we are able to provide you with the local understanding and knowledge of the implications of what you have proposed and would urge you to work with us to make sure the Local Plan is both viable and realistic in the Holme Valley.

The Council objects to the following site allocations:

Scholes (Sites H8 and H38 as were known along with the new PDLP version H297, H597 and SL3359) and Cinderhills (Sites 47 and H335) – 215 houses/(188 houses Scholes site only)

Comments as made previously (in early 2016) still apply, with some amendments:

1. Appropriacy of housing

- Nationally, there is a need for smaller houses (1 or 2 beds) with ready access to work and transport. Developers would be looking to build 3 or 4 bed homes, but there are already many of these in the existing developments in Scholes. Our greatest need for housing in Holme Valley South is for what were called ‘affordable houses’, now referred to as ‘starter homes’; we need 1 or 2 bedroomed houses (as first time buyer homes) and 2.5 bedroomed houses and good quality flats (as second time buyer homes).
- The size and density of the developments have no regard for the size, character, and setting of the village. 20 years ago a planning inspector said of a proposal to build 91 homes on part of H38: “... it would be incompatible with the size, character and setting of Scholes...” and rejected the proposal. (NPPF 50 and 58/DLP2.2a refer).
- The population of Scholes already stands at 1990 people; the development of these sites would increase the population by approx. 20% (assuming 2 persons per household).
- The village has already been over-developed and these proposed developments add nothing to local amenities, in circumstances where the village has recently lost the local working men’s club and parking area to development (NPPF 28/DLP3 refers).
- Site H8 is in the Green Belt. (NPPF 79 and 89/DLP2.4 refer). Development on greenfield sites is not supported, when there are lots of existing brownfield sites, e.g. the old Alexander’s Garage (off Bradford Road); the site of the old sports centre in Huddersfield to name but a few.

2. Employment: There are very few jobs in Holmfirth. Those that do exist tend to be low-paid ‘service’ industry jobs. That means that most of the people who moved to these houses would be taking work elsewhere – Huddersfield, Manchester, Bradford and Leeds. Apart from Huddersfield, these are not readily accessible by public transport and, therefore, given the absence of local employment opportunities, they will significantly increase commuting by private car. (NPPF 30 & 32/DLP20 refer).

3. Highways Infrastructure

- Roads around Scholes are narrow and often have parked cars on either side. The lack of parking down Paris from the crossroads to the Post Office and then on to Brooklands and Totties garden centre has made these roads into a daily slalom, cars diving in and out of gaps to make progress and avoid other oncoming cars.
- Since the re-development of St Georges Club into four houses, cars visiting the Post Office and Boot and Shoe are now parked on the road, making it very narrow.
- Buses struggle to get through at times and drivers regularly have to pull in or reverse to allow larger vehicles through. Emergency Services would also have difficulty.

- Concerns re additional traffic at school time – both the village primary school and Holmfirth High School have had serious traffic issues for many years, so increasing pupil intake can only make this problem worse.
- Access to Scholes via Cross Gate road is difficult and also narrow. In winter this often becomes impassable. This leaves the only sensible access to Scholes as Scholes Moor Road via Hade Edge and, in reality, it is not possible to insist that new people use this as the main access route. People will travel in the direction they need to go and the roads are just not suitable for a large amount of traffic. They are country roads, built primarily for a small amount of traffic and farm vehicles.
- The highways infrastructure is much as it was 30 years ago, beset with pinch points and lacking pedestrian footways. Such public transport as there is struggles with these pinch points.
- As long ago as 1987 the Council's Holmfirth and Meltham Local Plan stated at para 13.6.2: *"The residential areas of Wooldale, Scholes, Totties, Netherthong, and Upperthong have inadequate access arrangements which have been exacerbated over recent years by developments for which planning permission was generally given over 10 years ago. Investigations have been carried out to examine the opportunities to improve the highways network in these areas. However, with the limited resources available no highways improvements beyond those detailed in Paragraphs 13.4.2 to 13.4.6 above are currently envisaged within the Plan period. In this respect further residential development of these areas beyond low density infill should be resisted."*
- Many local roads are too narrow and in many places lack pedestrian footways. (NPPF 34/DLP20 refer).
- The road junction exits surrounding the village are awkward and constricted even for the current amount of traffic and adding over 200 more cars (conservative estimate based on only one per new household) will without doubt increase the number of accidents at pinch points.
 - a. At Dunford Road close to Underbank Rugby Club entrance (fast blind corner)
 - b. Cinderhills to Holmfirth road (very narrow, blind corners, single lane due to lots of parked cars)
 - c. Scholes to Jackson Bridge (very narrow, blind corners, single lane due to lots of parked cars)
 - d. Via Scholes centre via Totties and down to New Mill (very narrow, blind corners, single lane due to lots of parked cars)
- Often gridlock at Holmfirth centre since the 'new' traffic lights having a detrimental impact on flow of traffic, particularly from New Mill and Dunford Road.
- The roads are currently in a poor state and will get worse due to an increase in use. However, there are no proposals to improve the highways or increase school places south of Huddersfield over the next 15 years. (NPPF 32/DLP3 refer).

4. Utilities/Services:

- Scholes area already suffers from frequent power disruption to electricity supply, so there is obviously an issue at the sub-station.
- Concern that mains sewers and sewerage works do not have the capacity to cope with all the proposed new building.

5. Environmental Issues

- The road gullies are already overflowing on a regular basis so adding the extra development to the already insufficient sewerage system is going to make this a serious recurring problem.
- Road drainage unable to cope with rainfall and surface water already, making roads dangerous at times, especially in winter.
- Recent weeks have seen unprecedented flooding across our region. This raises serious issues about areas where rain water can soak away. We have already seen flooding in New Mill and Dunford Road often looks like a river after heavy rainfall. Covering pasture with buildings will not help this situation.
- At present the area supports a wide range of flora and fauna, which helps to give the area its character. Any level of development would reduce the diversity present in our area.
- Site H8 is Green Belt land and should not be touched at any price.
- They are close to the Morton Wood Local Wildlife Site. (NPPF 109 & 117/DLP31 refer).

6. Education: Local schools are already full and no capacity to take a further 200 children (from this development alone); village school is full and over-subscribed. (NPPF 72/DLP3 refer).

7. Farming

- The land proposed is regularly used as pasture for cattle. How will the local farmers be affected by the loss of land to use for their animals? Farming is already under threat and restricting the land available for grazing would be detrimental to local milk production.
- Proposed development on these sites would destroy rather than encourage local business by taking away grazing land (the local milk producer would close) and would detract from the local landscape which attracts tourism – a vital part of the local economy. (NPPF 17 & 28/DLP10 refer).

8. Impact on Tourism: The Valley attracts tourists - both day visitors and residential - to the area, who come as a legacy of Last of the Summer Wine. However, they are also increasingly attracted by the local festivals (Film, Arts, Art Week, Folk festival) and also the possibility to enjoy the countryside and relax in the local area. Some of the local development planning looks at how to utilise these opportunities. Scholes features in several local walks and cycle rides, often taking visitors over to the pub and cafe in Hepworth. Any development of this area creates an almost continuous stretch of housing from Holmfirth centre right out into the countryside.

9. Play Areas: The only local children's playground in the village (behind the Moorlands estate) will disappear under the footprint of site H38. (NPPF 74/DLP3 refer).

The Parish Council is aware that the playground has been removed from the Local Plan and, therefore, is to remain as it is now. We are happy to see that the playground will remain as it was and would like to suggest that it remains this way indefinitely.

The Parish Council has recently had communications from Scholes residents with continuing concerns about the amount of housing allocated for Scholes. They also attended a recent Planning Committee meeting to voice their concerns. While the Local Plan process has been progressing a lot of the Scholes residents were suggesting that more brownfield sites should be used before greenfield/green belt sites were used or allocated for use. The suggestions were made by several residents that the nearby site at Dobroyd Mills, Hepworth/Jackson Bridge should be used for housing as it is a brownfield site.

Whilst the process of the Local Plan has been ongoing, the owners of Dobroyd Mills, Hepworth/Jackson Bridge have now submitted plans to develop the site for housing. The Parish Council feels that this would be a more appropriate site than building on the greenfield site in Scholes. This should then also greatly reduce the issue of excessive housing in Scholes.

The Parish Council is happy that H8 and SL2300, which are on green belt, are now both rejected sites and would like to suggest that they remain this way indefinitely.

The Parish Council notes the splitting up of H38 into three separate allocations on the same footprint as H38, with an immediate allocation for 188 new dwellings, namely H297 (47 dwellings, 1.37 hectares at a density of just over 34 per hectare), H597 (141 dwellings, 4.04 hectares at a density of 35 per hectare) and SL3359. This results in a reduction from 215 to 188 dwellings. The Parish Council recognises this reduction, but would prefer to see a further reduction in housing within Scholes.

Holmbridge – Site H626

Comments as made previously (in early 2016) still apply:

1. Appropriacy of housing: Kirklees Council deem the field to be suitable for the erection of 19 dwellings, even though they have rejected the inclusion of the field within a larger site (H724) due to access difficulties and the significant impact on the highways, as well as highlighting issues

regarding education, biodiversity, flood/drainage and public health. Other sites on this side of the Holmbridge Valley have also been rejected due to transport issues (H337, H725, H1767, H135).

2. Green Belt: The site is currently pasture land, views from the field have intervisibility with the Peak National Park, including Holme Moss.

3. Highways:

- The site is to the south of Dobb Top Road, a substandard local access road without the benefit of footways serving residential properties and agricultural land. Access to the major road network (the A6024 Woodhead Road) is via Laithe Avenue and by Bankfield Drive or Laithe Bank Drive onto Dobb Top road and either by Smithy Lane to the west or by Dobb Lane to the north-east.
- The most convenient route to the site from the district distributor Woodhead Road A6024 is via Bank Lane or Smithy Lane, which are also substandard and do not have footway provision. Both roads form acute angles with Dobb Top Road and because of their limited width it is not possible for vehicles to turn to and from Dobb Top Road without reversing and the use of the whole carriageway width. At the junction of Dobb Top Road with Smithy Lane the turning movement is achieved by carrying out a U-turn within the bell mouths of Bankfield Drive or Laithe Bank Drive at their junctions with Dobb Top Road. Smithy Lane is often lined with parked cars on one side, making the road even narrower.
- Dobb Top Road has a carriageway width of approximately 4m, it measures 6.5m overall including the side verges. In part the road is collapsing due to maintenance being required to the wall and the vertical steep banking which drops away along one side of it. To the top of Dobb Top Road there was recently, major structural work carried out where the road and wall had collapsed above housing on Bank Lane. The road is lit to side road standard, is subject to a 30mph speed limit and is not subject to any on-street waiting restrictions.
- Laithe Avenue is a traditional estate road with a carriageway width of 5.5m and 1.8m footways either side and reduces to 3.5m wide. The gradient of Laithe Bank Drive and Bankfield Drive is in the region of 1:6 and there is no level platform with their junctions with Dobb Top Road. Given the location of this land with respect to the Pennines this can frequently cause problems to vehicle movement during periods of inclement weather.
- Access to the network can also be obtained via Dobb Lane to the north-east. This route also presents difficulties due to the adverse vertical and horizontal alignments of the road, particularly at the junction of Co-op Lane with the A6024 where the vertical alignment is extremely severe with no standing platform and restricted visibility. Significant increases in traffic flow would intensify the potential of conflict between pedestrian and vehicular movement. Particularly there is a school (Hinchliffe Mill J and I School) at the junction of Dobb Top Road, Dobb Lane and Hollin Brigg Lane and traffic at school time is already chaotic and the school is very concerned about existing road safety.

4. Previous Planning History

- Outline planning permission for this site, together with a further area of land behind Netherley House, was refused by Kirklees for the construction of housing, firstly in 1980 and again in 1992. On 20 November 1992 Kirklees refused planning permission to a local developer for the erection of 39 houses and on 28 April 1993 the developer's Appeal against this refusal was dismissed by the Economic Development and Planning Service. This involved submission of written evidence to the Department of the Environment. The appeal was turned down on Highway safety – increased risk of vehicular and pedestrian hazards due to the narrow minor road network, the steep gradients of the access roads of Smithy Lane, Bankfield Drive and Laithe Bank Drive, the lack of footways on Dobb Top Road, Smithy Lane and Bank Lane and increased traffic on the A6024. An Inspector for the Department of the Environment concluded that “The proposed development would lead to an increased hazard for other road users and pedestrians and that the danger would be sufficient to warrant dismissal of the appeal.” These reasons are still valid but amplified because:-
- Since this time, 38 new dwellings have been erected or have planning permission along the minor road network on this side of the valley (from the top of Dobb Lane to the end of Bank Lane). This includes Millfold on Bank Lane (5 houses) and 7 houses on Bank Lane. This is in addition to the two large estates which have been built at Moss Edge View (24 houses) and

Broadfield Park (41 houses) and many other residential developments along the A6024 on both sides of the Holme Valley. This has significantly impacted on the volume of cars and pedestrians on the minor roads and the A6024. There is planning permission for many more dwellings along the A6024 and in Hinchliffe Mill - the full effect of the houses not yet built on the minor and major road networks has not yet been experienced.

- The minor roads near Bankfield Drive must be used for children to travel to school either on foot or by car. A large number of school children walk along the roads to Hinchcliffe Mill school and to catch the High School and college buses in the mornings and afternoons and there are no footpaths on these narrow roads. Holmbridge Out of School Club, Holmbridge Pre-school and local childminders also use Smithy Lane and Dobb Top Road to walk groups of children to Hinchcliffe Mill School. The School, incidentally is full to capacity and will struggle to accommodate the children from any more dwellings. Kirklees have advised Hinchcliffe Mill School that there is no money for expansion or new buildings in the foreseeable future. There are no proposals to improve the highways or increase school places south of Huddersfield over the next 15 years
- Given the proximity of this land to the Pennines (Bankfield Drive is 201 metres above sea level – compared to Holmfirth at 128 metres), the gradient of the roads can frequently cause problems to vehicular movements during periods of inclement weather. The already high volume of traffic has seen a number of recent instances which could have resulted in serious injury or worse. For example, there have been recent accidents where cars have slid down the steep slopes of Bankfield Drive and Laithe Bank Drive (which are not gritted by the Council in inclement weather) and across Dobb Top Lane into the stone wall. The last thing we as residents (and we are sure the local Council and Planning Authority) would want is any such injury on Smithy Lane, Dobb Top Road, Bankfield Drive or Laithe Bank Drive due to general traffic volume or a car losing control in icy conditions.
- As we are all aware, these roads are a nightmare when ice or snow is on the ground. In icy or snowy conditions it is frequently impossible to drive up Bankfield Drive, Laithe Bank Drive, Smithy Lane and Dobb Top Road, causing a situation where the parking for all the surrounding estates can already stretch back half way to Holmfirth which is 1.9 miles from Bankfield Drive, Holmbridge. There will simply not be enough passable roads to park on should the proposed development be approved. This would mean residents would not be able to travel out of the valley to work, school etc., in poor weather conditions.
- The West Yorkshire Cycle Route goes along Bank Lane, Smithy Lane and Dobb Top Lane to Hollin Brigg Lane, so the number of cyclists on these roads has also significantly increased, adding to the potential for accidents.
- There is a regular Hopper Bus which uses this route as well as an increase in online shopping delivery vehicles (online shopping is well used due to the remoteness of the area and lack of shopping amenities).
- The erection of 19 dwellings would potentially mean an extra 40 plus cars using the road networks. There has already been an increase in car ownership in this area of at least 50% since 1993 – most households now own at least 2 cars – due to poor public transport links; this means that Holmbridge is already dangerously congested with parked cars all the way along the A6024 from the Bridge Tavern to Shaw Lane which create a “slalom” effect for traffic – especially dangerous in bad weather.
- The development of Holmfirth Vineyard and Cuddy’s farm as tourist attractions has also increased the volume of traffic on the minor road network at this side of the valley, as both are accessed via these routes. Holmfirth Vineyard has 40,000 visitors each year.
- As Holmbridge is at the top of the Holme Valley, any building here has a significant impact on the traffic on the A6024 entering Holmfirth and causing congestion, an issue which has already been well documented in Holmfirth. The majority of traffic heads one way to access facilities, employment, shops, health care etc. and has to pass through Holmfirth. There are no alternative routes. This makes the impact of 19 houses here much greater, as traffic does not disperse, compared to other locations.

5. Intrusion into open land:

- In 1993 Kirklees said “the proposed development would be detrimental to the character of the surrounding area”, agreeing with previous comments that development of this site would “form

a large scale expansion into open rising countryside and thereby significantly detract from the character and scale of Holmbridge,” and “destroy the visual amenity of this particular part of Holmbridge.” This would still be the case: Kirklees District Landscape Character Assessment (July 2015) –

<http://www.kirklees.gov.uk/business/regeneration/localPlan/pdf/KirkleesLCARreport.pdf> - mentions Holmbridge (page 42) and states that “to the South of Holmbridge there is a clear transition to a more upland character with features such as reservoirs and coniferous plantation becoming more dominant in the landscape.” It states further that views go up to the “upper reaches of the valley where there is clear intervisibility with the Peak National Park, with the southern parts of the area falling within the National Park boundary.”

- The field to the west of Bankfield Drive has such views reaching up to Holme Moss and Saddleworth Moor. To build on it would diminish the recreational amenity it provides, an area of natural beauty and public amenity would disappear.

6. The Environment & Tourism

- A well-used public footpath, affording views of the landscape, runs alongside the top of the field. The footpath is part of the Holmbridge and Holme Way as advertised by Kirklees council - <https://www.kirklees.gov.uk/visitors/documents/HolmbridgeHolmeWalk.pdf>
- Increased tourism in the area, including the development of Holmfirth Vineyard and Cuddy's Farm to provide holiday accommodation, and the cultural background of Last of the Summer Wine, also demand that we keep these open views for the benefit of the economy and employment opportunities in the area.
- The West Yorkshire Cycle Route runs along the access roads to the site and is enjoyed by many cyclists – a recreational activity which is being encouraged by British Cycling following the legacy of the Tour de France/Yorkshire.
- The site is currently a field and the open meadow provides a habitat for many species of wildlife that border the Peak District including hares, bats, and many insects and birds.
- When Yorkshire Water built their water treatment plant in Brownhill Lane, Holmbridge in 1995, local objections led to the plant being mostly hidden underground to ensure it had no aesthetic impact on the local landscape. This preserved the view from site H626 as the treatment works would have spoilt this very landscape. It was Europe's first underground water treatment plant.
- Drainage of the land. There is a large spring running through site H626 which floods the field in wet weather. The drains on the existing residential site are full to capacity with many residents reporting problems with blockages. There have been incidents of sewerage spilling onto Highways for example on 3 May 2015 when sewerage was leaking onto the A6024 by Holmbridge Church.

7. School places: The nearest infant and junior school, Hinchliffe Mill School, is already overcrowded. Further building in the Holme Valley will also have an impact on places at Holmfirth High School.

8. Public Health: Residents in the Holme Valley are having difficulty registering with doctors and dentists as they are full. In an emergency the nearest hospital is Huddersfield Royal Infirmary (9.7 miles away) and many services are in Calderdale Royal Hospital (14.5 miles away). Residents of Holmbridge must travel through Holmfirth to access the hospitals and increased traffic on the roads due to significant building in the Holme Valley makes it a risk to patients.

The Parish Council has recently had communications from residents of Holmbridge with their concerns that not only had the Bankfield Drive Site 626 been left in the Local Plan (when they had requested that it be removed on highways and sustainability grounds) but the number of houses on Site 626 had increased from 19 houses to 23 houses, despite 87 objections to this site being listed as a designated housing allocation.

It appears that Kirklees Council has not listened to the objections and the residents concerned now have to go through a much more complicated process of consultation, to try to prove that the plan is unsound.

The Parish Council supports the residents' concerns and reiterates that the inclusion of site H626 as an accepted site for housing is contrary to the aims of the National Planning Policy Framework, particularly 17, 28, 29, 30, 37, 72, 75, 109, 110, 155 and 157 and that it will not support sustainable development.

The more the residents have investigated the details of the research into the suitability of the site the more inconsistencies have been uncovered in Kirklees Council's approach to researching sites. The detailed features of individual sites have not always been consistently assessed, e.g. site SL2133 - a similar sized plot at the other end of Laithe Avenue is rated red for transport whereas H626 is rated green, Kirklees deem SL2133 as unsuitable for development because of access via Dobb Top Road - to get to H626 the same minor road network would be used.

Natural England has recommended that the buffer from the Peak National Park boundary before development is allowed should be extended beyond the 500 metre buffer set by Kirklees Council. However, no revision had been made by Kirklees. Site H626 is approx 625 metres from the Peak NP boundary - a fact not mentioned in Kirklees Council's assessment of the site.

The Parish Council objects to site H626 as it will not support sustainable development. The Parish Council would also like Kirklees Council to designate this land as 'safeguarded land' if Kirklees Council is not prepared to remove this site from the Local Plan.

Dunford Road, Hade Edge – H288 (H288a)

The Parish Council has recently been communicating with Hade Edge residents regarding their concerns about this site; many of the residents attended a recent Parish Council Planning Committee meeting to address Members of the Committee on their concerns. The land in question was safeguarded land on the Unitary Development Plan, but this has changed to building land and consequently the site then changed to H288a.

The Parish Council feels that the nearby Washpit Mill site would be a more appropriate location as it is in need of development and is brownfield land. The Parish Council would encourage the development of 2 and 2.5 bed houses or flats on the Washpit Mill site and this would allow the land at Hade Edge to remain safeguarded land. Building on the at the Hade Edge site H288a would take out greenfield agricultural land, whilst the Washpit Mill site would not as it is already brownfield. Farming sustainability must be considered, especially as we do not know the full outcome of leaving the European Union from where we import a lot of our food.

On these grounds and its potential detrimental impact on the Peak District National Park, we feel that H288a Land at Dunford Road, Hade Edge, Holmfirth should remain safeguarded land on the new Local Plan.

Honley – ME1970, ME1971 and ME1972

Comments as made previously (in early 2016) still apply:

The proposal for a stone quarry on the 70-acre site off Meltham Road is unacceptable – it would be the size of 70 football pitches and is unwanted, providing no benefit to the village.

The level and type of heavy traffic through Honley would dramatically increase; noise pollution, road safety and dust would be intolerable.

Land banks held back by building companies within Kirklees

The Parish Council would also like to comment on the large amount of land banked within Kirklees that would more than likely fulfil the need for housing within Kirklees. A lot of the land has already been cleared in preparation for building, but the builders are refusing to develop it so increasing the need for further allocations in the Local Plan.

The Parish Council would like to suggest that Kirklees Council puts measures in place to encourage or even force building companies to build on sites with planning permission within a defined period of time or sell it on to another developer that will. Development of these sites now is paramount, to meet the housing needs within Kirklees and the Holme Valley.

Summary & Recommendations

The Parish Council objects to the development of the abovementioned sites, as the proposals are not in line with national and local planning policies (NPPF and DLP). The Parish Council therefore recommends that all these sites are removed from the draft Local Plan Site Allocations.

The Parish Council was disappointed to learn that Kirklees Council would not be holding its own drop-in sessions in the Holme Valley but, from our own contribution to the process, the Parish Council would ask Kirklees Council to listen to the views of all those residents who have commented on the sites in our area, and perhaps Kirklees should rethink its approach in Hade Edge, Scholes and Holmbridge particularly.

The Parish Council feels that there are other more appropriate sites for development in Kirklees, which should be considered as alternatives to excessive development in the Holme Valley. For example, the Parish Council would support the development of the site at Storthes Hall, which has better access and road/highways infrastructure, and would alleviate the traffic congestion in more rural locations such as Scholes.

There are real concerns that, under the draft Local Plan, there will be no transport infrastructure improvement in South Kirklees despite more homes to be built. Existing roads and road junctions are already at over-capacity and any further large-scale development in the areas mentioned above is therefore unsustainable.

The Parish Council understands that Dobroyd Mills and Washpit Mills are classed as 'Windfall sites'. However, the Parish Council would prefer to see these two sites as part of the housing allocation for the Holme Valley, so as to reduce the impact on other PDLP sites in the Holme Valley.

Sally Barber

Sally S Barber (Mrs)
Clerk to the Council

cc Jason McCartney MP
Huddersfield Examiner