



Kirklees Local Plan Examination

Stage 1 – Initial Hearings

Hearing Statement

**Submitted on behalf of Save
Mirfield**

**Matter 8 - Approach to site
allocations and Green Belt
released**

September 2017

Matter 8 – Approach to site allocation and Green Belt release

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

1. Save Mirfield have already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, Save Mirfield wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Save Mirfield also wish to speak at the hearing in relation to Matter 8. Specific matters relating to proposed allocations H2089 and SL2163 will be addressed at Stage 4 and Save Mirfield will be participating in this stage as well.
2. Matter 8 – question (a)
 - 2.1 Save Mirfield believe that the Council have failed to undertake a robust and comprehensive assessment of development capacity within the existing urban areas and other areas outside of the Green Belt.
 - 2.2 Save Mirfield consider that if the Council were to look properly at the available development capacity within the existing urban areas (actual urban areas, not areas which are far removed from the urban area but which are being classed as being part of the urban area, such as proposed allocation H2089) they would find that their aspiration to have a brownfield first approach to development could be achieved and the precious Green Belt could be maintained.
3. Matter 8 – question (b)
 - 3.1 The Green Belt around Mirfield is narrow as acknowledged within the Local Plan where it states that there are “narrow green belt gaps separating some settlements particularly around Mirfield.”
 - 3.2 This area of Green Belt is already very fragile and if it is further eroded communities will cease to exist which is unacceptable.
 - 3.3 The area of Green Belt around Mirfield continues to serve a purpose as Green Belt land. The area keeps in check the unrestricted sprawl of Ravensthorpe, Dewsbury and Mirfield and it prevents these neighbouring towns from merging in to one another. This area of Green Belt also safeguards the countryside from encroachment.
 - 3.4 The Council appear to suggest that the need to meet housing requirements is sufficient exceptional circumstances to justify removal of this land from the Green Belt. However, Save Mirfield do not consider that this is sufficient to be an exceptional circumstance to remove huge areas of land from the Green

Belt. Furthermore, Save Mirfield do not consider that the housing requirement is correct nor that brownfield options have been fully explored.

3.5 The Green Belt is a finite resource and should be preserved. The draft Local Plan does not do this.

4. Matter 8 – question (d)

4.1 Save Mirfield do not consider that the Council's approach to assessing potential sites in the Green Belt for development is soundly based.

4.2 The Green Belt review was not robust or justified.

4.3 The Green Belt around Mirfield serves Green Belt purposes and these have not been fully assessed by the Council as part of the review.

4.4 The gap which would remain around Mirfield would be insufficient to stop the merging of settlements and Ravensthorpe, Mirfield and Dewsbury would lose their separate settlement identities.

5. Matter 8 – question (f)

5.1 A number of sites are identified as being Safeguarded Land. Some of these sites such as SL2163 are currently allocated as POL (provisional open land) within the UDP.

5.2 Policy D5 of the UDP sought to protect POL sites from development for the plan period in case the site was required for developed in the next plan period. We are now entering this next plan period.

5.3 The NPPF requires the Council to base all land allocations on objectively assessed needs. However, Save Mirfield can see no evidence to show that the Council has done this in relation to safeguarded land.

5.4 There is no evidence to show that these safeguarded sites will be required for development in the next plan period.

5.5 In particular site SL2163 has been the subject of two planning application for housing development and on both occasions it has been shown to be unacceptable and unsustainable for housing development. This site should therefore be allocated as green space to protect it from development rather than safeguarded land for potential future development.

5.6 No evidence has been submitted to show that safeguarded sites are capable of delivery in the long term.