

**Kirklees Local Plan Examination Stage 1 – Initial Hearings- Jane Ellis.**

**Matter 8 – Approach to site allocations 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? Policy PLP 6**

**d) Is the Council’s approach to assessing potential sites in the Green Belt for development soundly based and in line with national guidance?**

1. The councils approach for the release of precious green belt land and lack of inclusion of safeguarded land within Kirklees for development does not support the longevity of green belt as specified within the NPPF (Department for Communities and Local Government, 9, 79-92, 2012).
2. The council’s green belt review which incorporates an unsound methodological approach is negatively affected by its subjective nature. Also, the lack of factual detail regarding site sustainability and deliverability alongside reasonable sustainable patterns of development within the proposed green belt edges is implausible. This has led to inappropriate site allocations and rejections for greenbelt release and unjustifiably low safeguarded sites within the proposed Kirklees PDP.
3. The possible amendment of methodology used within the green belt review was summarised within my consultation comments. However, I have included my comment below as the council has not responded within EX17.

*The councils ‘methodology’ in accessing greenbelt edge tests 1b and 1c which are qualitative in nature, they should be further expanded to engage a wider perspective to draw an accurate conclusion on ‘likely scales of development’. This cannot be assessed through the physical scale of sites alone but should also be assessed on the ‘sustainability of development’. So, to draw an accurate conclusion greenbelt edge tests 1b and 1c should be assessed against the number of constraints and the ‘likely scale and sustainability of a possible development’.*

4. As such, I am majorly concerned given that 1452 acres of greenbelt within the Kirklees area has been included in the PDP for release. As stated within my consultation comment, the councils green belt review methodology does not transparently take into account the sustainability of greenbelt sites due for release.
5. I was pleased to see this point highlighted in the ‘initial note from the inspector’ (EX2,19, 25 May 2017), with regard to sustainable development requirements and the need to promote sustainable patterns of development within the decision-making process.
6. However, having reviewed the council’s response EX13 against the Local plan methodology statement part 2, spatial development strategy 4.16, more specifically the council’s intention of ‘sustainable extensions to settlements where exceptional circumstances can be demonstrated to release land from the green belt’ and their ‘commitment’ to brownfield identification and its use. I am not appeased that the issue has been resolved within EX13, my concerns are intensified on the following grounds.
7. The information put forward by the council (BP29, EX13) remains inadequate in clarifying the sustainability of green belt release sites and sustainable patterns of development within the newly proposed green belt boundaries.
8. SA objective justifications within EX13 (BP29) can only be viewed as fictitious, due to the vague and subjective conclusions (‘likely to be, may include, could be, may be’) reached by

the council on many points. The vague conclusions within the site -proformas, are not in line with NPPF (2012) paragraphs 84 and 85, EX13 is a reverberation of policy, just words without facts (no further reading to expand or justify the council's words is available).

9. I can only conclude that this is due to the flawed approach the council have taken when assessing green belt release. Further to reviewing EX17 to EX20 in search of clarification on EX13, I am not convinced that the council's site allocation for green belt release sites have considered sustainable development requirements.
10. Considering the aforementioned points, when assessing the release of large green belt areas, the total area should be assessed within the Local plan as one plot, where no material disruption exists. This would ensure that sustainability issues and green belt appraisals are not distorted or diluted by carving up the total green belt area into smaller sites, as has happened in the Kirklees area.
11. An example of this is seen in Fenay bridge, sites H2684a and H2730a have been assessed as separate green belt areas, these sites are actually one large area of green belt. When the constraints for this total site (H2784a & H2730a) are compared against other rejected large sites (that have been submitted as a whole), constraints and sustainability issues within the Fenay Bridge site are heavier or equal to other comparable rejected sites.
12. Confusion has arisen from this issue throughout the process, where large areas of green belt have been configured into numerous site layouts for assessment, causing the same area of green belt to be rejected and accepted for release due to reconfiguration within the process. This disparages the whole process of the green belt review and undoubtedly obscures the assessment of sustainable development patterns for the council. As such, the following questions remain unanswered:
  - A. How sustainable are the councils present and future vision within the new green belt edges?
  - B. How have the council met the main government objectives for sustainable development as specified within 'A better quality of life, a strategy of sustainable developments in the UK, 1999'?
  - C. What are the special circumstances on individual sites to justify their release from green belt? are the justifications and assessments sound enough to ensure the best use of a natural resource?
13. Furthermore, Consequential changes of the greenbelt through small site changes should not be allowed when a small green belt site abuts / is part of a larger area of green belt land. For example, the Fenay bridge greenbelt site has also been subject to consequential change (Green belt review, Reference CCH2730a, H2730a) taking 0.383 Ha out of the green belt. It is a highly pre-emptive and illogical approach to release a parcel of land from larger green belt sites that is beyond the existing green belt edge prior to the local plan being approved, which weakens the existing green belt edge.