



Kirklees Local Plan Examination

Stage 1 – Initial Hearings

Hearing Statement

**Submitted on behalf of Chidswell
Action Group**

**Matter 8 – Employment needs
and delivery**

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. The Chidswell Action Group 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, the Chidswell Action Group wish to make the following additional comments in relation to the specific Questions raised by the Inspector. The Chidswell Action Group also wish to speak at the hearing in relation to Matter 8. Specific matters relating to proposed allocation MX1905 will be addressed at Stage 4 and Chidswell Action Group will be participating in this stage as well.
2. Matter 8 – question (a)
 - 2.1 The Chidswell Action Group 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 The Chidswell Action Group consider that if the Council were to look properly at the available development capacity within the existing urban areas 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. The Chidswell Action Group believe that there is a total under estimation on the part of the Council of the brownfield land supply and therefore an over estimation of the necessity for green field allocations and the necessary green belt releases.
 - 2.3 The proposed allocation of sites such as MX1905 (green belt site proposed for 1,535 dwellings and 122,500 sq.m. of employment use) falls to the bottom of the priorities list for development, as set out within the Local Plan. It is therefore unclear why sites such as MX1905 continue to be promoted ahead of sites which are in a higher priority i.e. brownfield sites?
 - 2.4 How can the Council claim to be committed to a brownfield first approach and then promote large green field/ green belt sites ahead of brownfield sites? The Chidswell Action Group considered that there are a number of suitable brownfield sites not being taken forward as part of the Local Plan and these should be considered ahead of any greenfield sites.
3. Matter 8 – question (b)
 - 3.1 The Green Belt is a finite resource and should be preserved. The draft Local Plan does not do this.

- 3.2 The Chidswell Action Group do not consider that exceptional circumstances have been demonstrated to justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional employment uses.
- 3.3 Within the Local Plan (paragraph 6.4) the Council seem to suggest that the proximity of site MX1905 to the M62 and M1 is the sole reason why this site is considered appropriate as a mixed use “strategic site”. This is not exceptional!
- 3.4 Furthermore, there is considerable doubt as to whether the roads which link the site to the M1 and M62 could accommodate any additional traffic. The Council have identified congestion on the local road network as being a constraint to development within the area of site MX1905.

4. Matter 8 – question (d)

- 4.1 The Chidswell Action Group 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 between Leeds, Kirklees and Wakefield is crucial.
- 4.4 The Council are proposing to release site MX1905 from the Green Belt but this piece of Green Belt serves a purpose.
- 4.5 This area of Green Belt keeps in check the unrestricted sprawl of Kirklees, Leeds and Wakefield. If this area of Green Belt were eroded it would mean that this very important area of Green Belt between Birstall, Batley, Dewsbury, Wakefield and Morley (Leeds) would be very fragile. This is already a narrow but vital strategic gap which prevents the mass coalescence of Leeds, Kirklees and Wakefield.
- 4.6 Wakefield Council have raised concerns relating to the green belt with this allocation. Wakefield Council are concerned that the proposed boundary to the south of the site would not be an adequate defensible boundary for the green belt (being only fields). They are also concerned that there is a lack of evidence relating to the sites contribution to the green belt and its suitability for removal. Wakefield Council points out that the whole area of green belt and its contribution as green belt has not be fully considered and additional evidence is needed to assess the contribution this area makes to the characteristics and purpose of including the land in the green belt. Wakefield Council concluded that there is currently insufficient evidence available to ascertain if the release of this site from green belt can be published.
- 4.7 This area of Green Belt is imperative in safeguarding the countryside from encroachment
- 4.8 This area of land should therefore be maintained as Green Belt. If it were removed there would be no green belt between Leeds and Kirklees. This part

of the green belt serves a vital purpose as green belt preventing the unrestricted sprawl of settlements.

- 4.9 When an application for permission to have an open cast mine on the Site was considered by the Council it was found that this land was “part of a major lung of open space separating Wakefield, Ossett, Dewsbury and Morley”. The evidence produced by the Council at that time concluded that the land was “a particularly important area of the Green Belt for the surrounding communities.” The value of this Site as Green Belt and as Open Countryside has not diminished since the Council make these comments in relation to the Site and possible open cast mining. In fact the lands role as valuable green belt land has increased given the amount of development which has taken place and which is proposed within Leeds and Wakefield abutting this area of Green Belt.
- 4.10 The Council have not sufficiently demonstrated why the land should be removed from the Green Belt in accordance with the requirements set out within paragraph 82 of the NPPF. Wakefield Council and the Morley Town Council have also raised this as an issue.