Response to Matter 8 – Policy PLP 6

Client: Downey Family

Agent: Savills

Site: Land at Gynn Lane, Honley (Site Reference H584)

**Matter 8 – Approach to site allocations and Green Belt Release**

1.1 This statement has been prepared by Savills (UK) Limited on behalf of the Downey Family in support of the allocation of the land at Gynn Lane, Honley Reference H584 (“the site”) in the Kirklees Council Local Plan.

1.2 This statement follows representations submitted previously in 2014, 2016 and 2017. For the avoidance of doubt this supports the Local Plan as a sound document in this regard and H584 as a deleted Green Belt site and allocation as a confirmed deliverable and developable site for residential purposes.

1.3 This statement only deals with Stage 1: Matter 8 and will look to comment on Stage 2 matters at the relevant juncture.

   **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?**

1.4 We agree with the Council’s identification of site allocations in respect of housing, and approach to Green Belt and maintain that it is sound and in line with national policy in respect of site H584. Discussing the two relevant questions in turn:

   **Do exceptional circumstances exist which justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional land for employment uses?**

1.5 For the avoidance of doubt the overall quantum of development is supported as an absolute minimum. Paragraph 84 of the NPPF determines that reviewing Green Belt boundaries should take account of the need to promote sustainable development patterns. In the instance of Kirklees, some 62% of the district is washed over by Green Belt and Green Belt, by its very definition, will be adjacent to urban areas.

1.6 In the interests of promoting the level of sustainable development required in a district so readily constrained by Green Belt, we support the Council’s decision to undertake a Green Belt Review and it is considered that exceptional circumstances do exist to justify Green Belt release in those areas where its role is weakest.
d) Is the Council’s approach to assessing potential sites in the Green Belt for development soundly based and in line with national guidance?

1.7 The Council is correct in using paragraph 80 of the NPPF as a basis to understand the strength of the Green Belt as a means to test appropriate locations for deletion and allocated growth.

1.8 We believe that the Council understand and recognise that not all Green Belt is essential to maintain the five purposes and it is considered that the assessment carried out within the 2015 Green Belt Review was undertaken in line with the NPPF (paragraph 80).

1.9 Further, we wish to highlight that this latest Green Belt Review is consistent with the longstanding evidence base for the Council’s emerging Development Plan, which reinforces the sound, clear and logical basis of the submitted Local Plan.

1.10 For example, with our client’s site (reference H584) it was recognised within the 2011 Kirklees Green Belt Review as an area where the Green Belt performs a less important role in accordance with the five purposes (see below extract, reference S2).

1.11 The site was reassessed at the point of the latest Local Plan and drew similar conclusions within the 2015 Green Belt Review. Under reference HB12 the site was scored as a 2 and was, in the context of the wider plan, soundly recognised as a deliverable and developable sustainable residential site.

1.12 For further information in respect of our commentary on the Green Belt Review please refer to page 19 of our Vision Document dated January 2016 which was prepared for the site.
1.13 In summary, we agree that the Council approach to site allocations and Green Belt release is sound and in line with national guidance from the perspective of site H584 as a suitable location for the deletion of Green Belt and allocation for residential purposes.