

CPRE West Yorkshire welcomes the opportunity to comment on this evidence paper. We will do so very briefly, as it does not change the nature of any of our representations.

The table of settlements is a helpful summary of information that has been hitherto rather difficult to assimilate, and for that reason we find it helpful. Similarly, the map of Green Belt releases makes it considerably to visualise the extent of Green Belt impacts that has previously been the case.

Our own brief analysis of the table of settlements indicates that the accessibility scores for settlements do not bear a significant correlation with whether or not there are Green Belt releases proposed in those settlements. We would therefore conclude that neither the current nor potential strength of settlements has had a noticeable influence on Green Belt release.

By comparison, the Green Belt review has had a strong influence on the choice of Green Belt release sites. In other words, in most locations the proposed Green Belt releases have been principally shaped by where the Green Belt impact would be least.

We understand that a key implication of this approach, as it stands, is that in settlements where no Green Belt changes are proposed, or where the settlement is washed over by the Green Belt, any development proposal that sought to change the settlement boundary would be treated as an exception, and would need to demonstrate very special circumstances for developing in the Green Belt. We are content with this approach.

Clearly, there is a significant variance from the approach, where the strategic extension sites are concerned. In this case it is evident that the effect of the larger Green Belt releases will be a marked degree of sprawl of Dewsbury, and reductions of openness between Dewsbury and Morley; Mirfield and Dewsbury; Cleckheaton and Scholes; and Huddersfield and Brighouse. These show that larger population centres with higher accessibility scores have been prioritised for higher levels of growth, but that the degree of harm to the Green Belt has been given lower consideration in these locations.

We can therefore summarise the draft Local Plan's approach as follows:

- If the strategic benefits of urban extensions are deemed sufficient, then the harm to the Green Belt is considered to be justifiable;

- In smaller settlements, the potential benefits of additional development are only considered justifiable if the harm to the Green Belt is low.

Our position remains that we are not satisfied that the strategic benefits of the urban extensions, especially with regard to their deliverability and to the regeneration needs within Huddersfield, Dewsbury and Batley centres, do justify the harm to the Green Belt.

Additionally, the evidence as presented in the paper appears to support our view that the scale of growth proposed for Skelmanthorpe/Scissett/Clayton West is disproportionate to its rural location, even though these settlements score well in accessibility terms.

Andrew Wood, 29th January 2018