

Stage 3 Hearing Statement – Upper Dearne Valley Environmental Trust
Matter 24 - Green Belt and open space policies

Issue - Does the Plan set out positively prepared policies for protecting the Green Belt and open spaces which are justified, effective and consistent with national policy?

[Policies PLP 54 – 63]

Firstly, we would like to draw attention to the apparent loss of original greenbelt policy DLP55 which said:

'Development in the Green Belt

The extent of the Kirklees green belt boundary is set out on the policies map. Inappropriate development in the green belt will not be approved except in very special circumstances in accordance with national policy.

Proposals for development within the green belt should in all instances;

- a) Retain its character and openness;*
- b) Be designed to take into account and seek to enhance the landscape character or the areas and be of a high quality of design and materials appropriate to its green belt setting;*
- c) Result in a good standard of amenity for new and existing users;*
- d) Retain and where possible enhance visual amenity and biodiversity;*
- e) Retain and where possible improve existing opportunities for outdoor recreation and access; and*
- f) Where possible result in the improvement of damaged or derelict land.'*

The loss of this 'overarching' policy statement appears to be a grave omission and we would like to question this further at the Hearing.

- a) Is criterion d in Policy PLP 54 clearly defined and effective? What standard of design and materials would be required?

We believe the standard of design and materials requires further definition. We are particularly concerned about the colour of buildings in rural areas/green belt. At one time, they had to be green or blue/grey. In recent times, the Council have allowed cream and light coloured building in the countryside and on top of hills which form a highly visible and ugly 'blot on our landscape' e.g. the industrial site at Grange Moor.

- b) Is Policy PLP 56 consistent with the exception outlined in paragraph 89 of the NPPF relating to the provision of facilities for outdoor sport, outdoor recreation and cemeteries in the Green Belt?

We believe further demarcation between the requirements for new and replacement buildings is necessary. What is currently stated is not in our view consistent with Para.89 exceptions. Reference needs also to be made to preserving the openness and avoiding conflict with the existing purpose of the land.

- c) Does Policy PLP 57 provide a clear and effective definition of a 'disproportionate addition' in relation to extensions?

Not clear and open to different interpretation

- d) What is the definition of 'original dwelling', as referred to in criterion a in Policy PLP 57?

No comment

- e) Are the criteria in Policy PLP 59 relating to impact on the openness of the Green Belt justified and consistent with paragraph 89 in the NPPF?

We feel criterion (e) should be re-worded to say '.....does not result in a greater impact on the openness of the green belt than the existing development' or words to that effect.

- f) Does the Plan make appropriate provision for infill development within settlements that are washed over by the Green Belt, in line with paragraph 89 in the NPPF?

No comment

- g) Are the criteria in Policy PLP 61, relating to Urban Green Spaces, justified and in line with paragraph 74 in the NPPF?

- Is the requirement in criterion b relating to accessibility necessary?
- Does criterion e accord with national guidance?
- Do the criteria provide an effective framework for assessing proposals on sites with no public access and public sporting/recreation function?

Criterion (e) does not accord with the intention of the NPPF, para 74 in our opinion. As it stands, it could be used as an argument for housing development for development on urban green spaces which we would view as unacceptable.

- h) By whom and at what stage will the open space assessments referred to in paragraph 19.43 of the Plan be executed?

Again, we would like to see Open Space Assessment carried out independently of developers.

- i) Do criteria b and c in Policy PLP 62 provide a clear and effective framework for assessing proposals, which is in line with the Council's approach to extensions and new buildings in the Green Belt as established in Policy PLP 57?

PLP62 should perhaps cross link to PLP57 for greater clarity

- j) Does Policy PLP 63 provide sufficient clarity regarding the scale and type of open space that will be sought in relation to development proposals?

Perhaps there should be a size site to size of open space ratio applied to developments of say, over 50 houses?? As it stands we believe the policy is vague, and too non-specific and will lead to poor provision of openness in housing developments. Developers should not be given a get out clause yet again!

