

Statement Regarding Matter 8

Submitted by:

Kirklees Community Action Network

Document Version

Version 3 – Final – September 2017

Q ref	Matter 8 – Approach to Site Allocations and Green Belt Releases
	<p>We are quite simply astonished and not a little angry that the Council is prepared to sacrifice a total of 587 Hectares (1452 acres) of functionally important Green Belt land, plus the land surrounding “Storthes Hall”; just to facilitate delivery of a contentiously assessed and unproven need for housing. In our view the Plan gives too little weight to the purposes of the green belt, as articulated in the NPPF, and far too much weight to inflated and unproven housing targets.</p>
8.a	<p>Development capacity in urban areas. We are not aware of the Council having undertaken a robust and comprehensive assessment of development capacity within existing urban areas and other areas outside the current green belt. On the contrary we have consistently argued that a significant part of the Council’s OAHN could be met by placing a strong focus on master-planned urban regeneration, but have seen no evidence that the Council have seriously considered or tested this option. The Council have made reference to the need for urban regeneration in Huddersfield and Dewsbury but have not included it as a strategic objective – it is almost a footnote in the plan. We are also adamant that the brownfield land supply and windfall levels have been very significantly underestimated. We therefore believe that development capacity within urban areas is significantly higher than the Council have allowed for. As stated, our preferred strategic alternative to green belt releases is to create new fully serviced “urban villages”, in designated inner-urban regeneration zones. Some, but not all, of the currently proposed strategic housing sites could also be developed in this way, providing they do not compromise the purposes of the Green Belt stated in the NPPF and in particular do not cause neighbouring towns and villages to merge in to each other.</p>
8.b	<p>Exceptional Circumstances. We do not believe that there are any exceptional circumstances which would justify the release of Green Belt land to accommodate 11,500 new dwellings, or indeed any significant development, at this point in time. Our reasons for saying this are:</p> <ul style="list-style-type: none"> • The OAHN is highly contentious and significantly over-estimated • Brownfield land supply and windfalls have been very significantly under-estimated • The Council have not properly considered the alternatives such as a strong focus on master-planned urban regeneration (which is critically important in its own right) • Whilst the Council have done a site by site assessment they have not properly assessed the strategic impact and long term risks of premature large scale green belt release. • The Council have not properly considered the joint strategic impact of large scale green

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	<p>belt releases, spanning the boundary with Calderdale and Leeds City.</p> <ul style="list-style-type: none"> All the current Green Belt land in Kirklees is functionally important, particularly in terms of limiting urban sprawl and maintaining separation between settlements.
<p>8.c</p>	<p>Amount of Green Belt land in Kirklees. The Council's oft repeated "political spin" - that the plan only sacrifices 2% of the Green Belt land in Kirklees - misrepresents the place specific nature, place specific purpose and spatial distribution of the Green Belt. The sacrifice may be only be 2% as a whole, but it is 100% in some very critical places. In fact much of the Green Belt land (measured by area) is in the South Pennine Special Protection areas and adjacent moorland fringes. It is therefore also protected under other statutory designations (e.g. the Habitats & Species and SSSI Regulations). So the very much smaller area of Green Belt that is actually under threat is in the urban / rural fringes around and between the urban areas and semi-rural settlements. This is because the green space between the settlements is already very small and the degree of urban sprawl is reaching a tipping point (e.g between Huddersfield, Mirfield and Brighouse and/or between the semi- rural villages in the Kirklees Rural District) where, if the green belt is further eroded, even by small amounts, hitherto discrete communities will cease to exist. The close juxtaposition of Green Belt and the urban areas is what actually makes Kirklees such an attractive place for people and businesses to come here to live and work (evidenced by Council surveys in 2016 of why businesses would choose to relocate here). Instead the Spatial Strategy, very mistakenly, chooses to sacrifice these most critical, functionally important, parts of the green belt, the areas which actually create the environment to attract people and businesses, just "to enable (contentious & unproven) housing delivery". We also put particular importance on the fact that retention of the existing green belt boundaries would also encourage much needed urban regeneration. NB: The relatively high proportion of functionally important green belt and other legally protected land in Kirklees may justify reducing the "objectively assessed housing need", rather than releasing significant tracts of green belt land for development. This would be entirely consistent with the NPPF which says that "Local Plans should meet objectively assessed needs <i>unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in this Framework as a whole</i>".</p>
<p>8.d</p>	<p>Approach to site allocation and phasing. We are deeply concerned that the Local Plan does not contain more robust policies and practical mechanisms for phased release of the various land allocations. Consequently, the (superficial) phasing schedules and delivery trajectories set out in the document are not realistic and are not enforceable. In our view it may be possible, even desirable, to maintain the same Plan aims, objectives, strategies and policies for a full fifteen year period, but we are adamant that it is totally unrealistic in the modern age, to set any parameters relating to practical plan implementation, such as fixed numerical housing "targets" and specific site allocations, for any longer than five years in to the future (six years including a 20% buffer). We therefore strongly argue that the ordinary development sites should ONLY be allocated / released for development on a five year (maximum six year) rolling time horizon. However, we do accept that the time frame could be longer for the larger strategic sites. We do not believe it is fair, necessary or practical to release specific sites for development more than six years in advance, given the huge uncertainties in accurately forecasting the District's housing and industrial development needs, or brownfield land availability, over longer time frames. If specific green field sites are allocated for development at the start of the plan, for the full fifteen years of the plan, it will massively discourage brownfield development and developers will simply "cherry pick" the best green field sites. Given that the brown field and windfall land supply has also been very significantly underestimated, premature allocation of green field sites will lead to green field sites being allocated for development when they don't need to be, a constantly growing "allocated land bank" and the Council having little control over where and when development occurs.</p>

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8.e	Process of Map Digitisation. Quite simply we believe that urban green space and green belt land should only be released for development in the most exceptional circumstances WHEN THE SPECIFIC DEVELOPMENT IS ABSOLUTELY NECESSARY AND THERE IS NO OTHER ALTERNATIVE. In our view the green belt boundaries should not be changed, other than the “tidying-up” exercise arising from the process of map digitisation.
8.f	Safeguarded Land. We are deeply concerned about Policy PLP6 and its practical implications. The rather threadbare justification for policy PLP6, as articulated in the plan, means that the Council will dismantle the Green belt boundaries today, so that they can theoretically be maintained, in their dismantled form, at the next plan review in 15 years’ time. Yet we have no idea and cannot predict what the world or Government policy will actually look like in 15 to 30 years’ time, let alone what the planning and land supply requirements might be. We note that the NPPF requires the Planning Authority to base land allocations on “objectively assessed needs”. However the need for “safeguarded land” allocations has never been “objectively assessed” and there is no evidence to show that they will be required for development in the next plan period (2032 to 2047), especially on the scale and in the locations proposed. It would be ludicrous to use the 2014 base ONS projections as an evidence base for the plan period 2032 to 2047; yet that is exactly what is being proposed. In our view, assuming that policies and planning attitudes remain the same, the planners in 2032 will seek to allow development on the safeguarded land that they have inherited from 2017 and roll back the green belt boundaries even further to create new “safeguarded land” for their successors to allocate for building in 2047. The Green Belt boundaries will therefore be subject to continual “roll-back” at every planning cycle and “safeguarded land” will simply become the first irrevocable allocation in the land supply chain. In our view, the Council have failed to acknowledge that, once green fields are identified in the plan as “Safeguarded” land, they become irrevocable “committed” allocations in the land supply chain, on the first stage of a one way conveyor belt towards development.