



Kirklees Local Plan Examination – Stage 1, Matter 8 Hearing Statement

For: Bradley Park Golf Club, Huddersfield
SHF.1381.001. P.R.001



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1 MATTER 8 – APPROACH TO SITE ALLOCATIONS 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?

- This Hearing Statement has been prepared by **Enzygo Environmental Planning Consultants** on the instructions of Bradley Park Golf Club. We have submitted representations on their behalf through the consultation process carried out by the Local Planning Authority and will be making site specific comments through the examination process.

1.1.1 For the purpose of this statement we comment on the Council’s approach to site allocations and in particular proposed large scale Green Belt releases at three strategic sites in Chidswell, South Dewsbury and Bradley Park Golf course. In total, these sites equate to some 5000+ dwellings out of the 21324 balance required to come forward in the Plan period. This equates to some 23% of the housing requirement. The overall release of Green Belt land proposed is some 11500 dwellings that equate to over 50% of the housing requirement.

1.1.2 It is accepted that there is a real need to review the Kirklees Green Belt. It is too tightly drawn and, as a planning tool, is acting as a major constraint to the growth aspirations of the Council. That said, the scale of release in the case of the strategic sites is huge and allocates housing on a scale not seen or delivered in Kirklees before. It is likely that these sites will be slow to come forward with the majority of housing coming towards the end of the plan period. Is it right that a significant proportion of housing delivery is likely to be so late in the plan period and possibly go beyond it?

1.1.3 We believe that a large number of smaller rejected Green Belt sites could have come forward without undermining the purpose of the Green Belt or having such

an impact on infrastructure etc. as the large strategic sites will. In many of these cases they have only been rejected because they are in the Green Belt with no other identified constraints to development. Many of these sites should have been identified as housing allocations and would have been delivered earlier in the plan period.

- 1.1.4 We think there has been an over reliance on the three large strategic sites to show that numbers can be achieved whilst in reality these are likely to come forward late in the plan period if not beyond it. The Green Belt review is long overdue. It should have been carried out when Regional Planning Guidance was first being formulated but was pushed back. This is a real opportunity to get it right to ensure that the new boundaries prevail in the longer term. By adopting the current Council strategy, it denies the opportunity for settlements to be sustained by relaxing the Green Belt around them and allowing an appropriate scale of development – housing and employment – to sustain the settlement in the future.
- 1.1.5 One other point relates to the identification of Safeguarded land. Given that the Green Belt should only be reviewed in exceptional circumstances, all options outside the Green Belt should be explored and considered before Green Belt is released. With this in mind, it seems perverse that land outside the Green Belt has been identified as Safeguarded Land. Should these sites not be considered as housing allocations now with fringe Green Belt sites considered as Safeguarded if necessary?
- 1.1.6 Furthermore, the Plan repeats the previous Unitary Development Plan’s approach of washing over a number of settlements in the Green Belt whilst in setting the majority. There is no understandable planning reason for this. In setting those settlements that are washed over would allow appropriately scaled development in the settlements that would help them to sustain existing facilities. All settlements in Kirklees should be inset from the Green Belt.
- 1.1.7 In conclusion we believe the housing needs of the district can be best met by a modified approach to site allocations and Green Belt releases as identified above.



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