

Matter 8 - Approach to site allocations and Green Belt releases

a) and b) An up-to-date brownfield register should be a pre-requisite for assessing development capacity; and increased residential densities that support sustainable settlement patterns should be used to assess site-by-site capacity.

In our view, the test of exceptional circumstances is a two-stage process.

- i. At the first stage, if comparing a realistic OAN with site availability outside the Green Belt indicates that GB boundaries would need to change, this would trigger exceptional circumstances to undertake a Green Belt review; but it should not pre-judge the findings of the Green Belt review. The Green Belt review should be undertaken alongside the Sustainability Appraisal, and should establish:
 - whether Green Belt boundaries could be changed without harming the purpose of the Green Belt;
 - whether changed Green Belt boundaries could deliver a more sustainable pattern of settlement than could be delivered otherwise;
 - which sites would form suitable allocations to implement that pattern.
- ii. The total capacity of those suitable sites then provides the top limit for how much land a Green Belt review can sustainably contribute to meeting OAN. If this is still not enough to meet OAN in full, then the Green Belt review finds a constraint on the housing requirement, which should then be less than OAN.
- iii. There should then be a further, second test of exceptional circumstances: are the advantages of meeting OAN in full are deemed to outweigh the harm to the purposes of the Green Belt, once all other policy considerations have been taken into account? For example, locating development in Green Belt locations may tend to have a greater impact on CO2 emissions, air quality, green infrastructure, but might relieve development pressure on urban green spaces.

It is not evident that this logic has been followed, nor that the sustainability of meeting OAHN in full has been adequately tested. In this context we do not accept that exceptional circumstances have been demonstrated for the proposed Green Belt changes.

c) We consider that the proportion of land in Kirklees within Green Belt is immaterial. It is the degree to which it fulfills its purposes, both strategically and locally, that is important.

d) The methodological approach taken by Kirklees in assessing Green Belt review does not adequately take into account its function in assisting urban regeneration. Allocating land from Green Belt for both housing and employment uses in clusters near to the motorway junctions will have the effect of shifting the emphasis of development activity away from the urban areas and undermine this purpose.

We also have specific concerns that many of the proposed allocations from Green Belt will not provide housebuilding at a sufficient rate to make a meaningful contribution to land supply. This is particularly true of the urban extension sites at Bradley and Chidswell, where their proximity to other large residential allocations proposed in Leeds and Calderdale presents a high risk of market saturation in those areas, and also calls into question the plan's assumption that Kirklees operates as a self-contained housing market area.

f) and g) It is unclear whether this question refers to existing UDP safeguarded sites being carried forward, or new safeguarded sites being identified on non-Green Belt land. In either case, we see no reason why new safeguarded sites must necessarily result from Green Belt changes. The principle of safeguarded sites is that they:

- provide a source of land for possible development needs beyond the Plan period;
- require a Local Plan review to allocate them, thereby keeping them available for their intended purpose;
- avoid the need for the next Local Plan to require a Green Belt review to provide additional land.

If these requirements can be fulfilled using sites not currently in Green Belt, this would be entirely consistent with national policy and guidance. To the extent that these requirements cannot be met without reviewing the Green Belt, this forms part of the justification for Green Belt review.

A crucial concern is that safeguarded sites have not been subjected to full site assessments and sustainability appraisals, so their fit with the Plan's spatial objectives have not been properly established. This creates two key risks:

- Firstly that identification of safeguarded sites at this stage makes presumptions about that they will have a strategic fit with a future Local Plan that they do not have with the current one;
- Secondly that if these sites come forward for early development (ie during the plan period) this will distort the implementation of the Plan's spatial objectives.

This leads us to the conclusion that sites not considered suitable for implementing the current Plan's spatial objectives should not be identified as safeguarded sites.