

## **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?**

#### **Policy PLP 6**

*[Note – this will cover the general approach to site selection and the Green Belt. Issues relating to individual site allocations will be considered at Stage 4. All matters relating to minerals and waste allocations will be covered at Stage 2]*

#### **Questions**

- a) *Has the Council undertaken a robust and comprehensive assessment of development capacity within existing urban areas and other areas outside the current Green Belt?*
- 1 There is evidence of tolerance being given to the merger of settlements e.g. Woodhead Road at Brockholes New Mill Road between Holmfirth and New Mill.
  - 2 The allocation of sites fails to take account of topography and accessibility,
- b) *Do exceptional circumstances exist which justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional land for employment uses?*
- 1 We question the population growth figures, as outlined above, used to estimate the number of new dwellings included in the Plan.
  - 2 We question the density of the proposed number of houses on the allocated sites.
- v. *To what extent has the process of assessing Green Belt sites taken account of the extent of remaining gaps between different settlements and the maintenance of separate settlement identity, and emerging proposals in neighbouring authorities that would reduce these gaps?*
- 1 No. As above, we have concerns.
- vi. *Is it clear how site development options were identified?*
- 1 It is not clear to us how the sites were allocated. We are aware of the use of the Sustainable Criteria but do not know what action was taken to ensure their consistent application. We can see evidence of a lack of consistency (e.g. H47 when compared with PDLP 16 at Cinderhills).
  - 2 We are unaware of the justification for changing the allocation at Hade Edge.

- f) *The Plan identifies a number of safeguarded sites on land not currently within the Green Belt. Is this approach justified and in line with national policy and guidance?*
- 1 We believe the word 'safeguarded' is a misnomer! It is not understood in the sense to which it is being used by ordinary people.
  - 2 We are concerned by the assumption of approval for development given land identified in this way, particularly since the allocation has not been subjected to public scrutiny.
  - 3 We consider that this unnecessary label will lead to planning blight and introduces inflexibility. This will impede emerging and future developments and lock the area into a moment in time.