

Yvonne Parker, Programme Officer,

1) I am writing, firstly with reference to Matter 8 (b) "Approach to site allocations and Green Belt releases" and then Matter 2 (i) Spatial Development Strategy"" in Stage 1 of the initial Hearings.

2) **Matter 8(b):** Many areas of Green Belt feature in the Kirklees site allocations. I accept that there is an urgent need for more housing as explained in the **Department for Communities and Local Government White Paper, February, 2017: Fixing our broken housing market.** (ref will be "White Paper") These proposals, although urging councils to make house building easier, nevertheless state emphatically the need to retain Green Belt.

3) The White Paper: List of proposals: Step 1: Planning for the right homes in the right places states **"Maintaining existing strong protections for the Green Belt, and clarifying that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements.**

4) Green Belt should only be built on when there are exceptional circumstances. Campaign to Protect Rural England is asking the Government to **"reaffirm that high levels of housing demand or housing targets do not in themselves amount to the "exceptional circumstances" required to justify changing Green Belt boundaries."** (Campaign to Protect Rural England – Green belt Under Siege 2017).

5) White Paper, page 28: 1.37 **"The Green Belt is highly valued by communities, particularly those on the edge of urban areas. The fundamental aim of Green Belt, since its introduction in the 1950s, has been to prevent urban sprawl by keeping land permanently open."**

6) I feel that the term "exceptional circumstances" has been used frequently by the council in the Accepted Site Options, Technical Appraisals documents. In assessing exceptional circumstances, councils apply the five purposes test to areas of green belt, one of which is: "To assist in safeguarding the countryside from encroachment." I feel this is a rather subjective test. Planners might see an area of Green Belt on a map or in a swift site visit and feel it is not serving to prevent encroachment into the countryside therefore indicating it can be released for housing. However, the site will have a very different value for the local inhabitants who are seeing a probability of areas of fields being gradually eroded due to Edge Reviews. In fact, in many cases it is the areas of Green Belt on the edge of settlements which are most valued by local people – they are areas of fields, frequently with footpaths where walks can be taken without the need for a car. Planning becomes a technical exercise with scant regard for local communities.

7) White Paper 1.38 “ In the last Parliament, the Government increased Green Belt protection by abolishing the unpopular and counter-productive Regional Strategies that sought to delete areas of Green Belt. Our manifesto reiterated our commitment to protecting the Green Belt. The National Planning Policy Framework is already clear that Green Belt boundaries should be amended only “in exceptional circumstances” when plans are being prepared or revised, but does not define what those circumstances are. The Government wants to retain a high bar to ensure the Green Belt remains protected, but we also wish to be transparent about what this means in practice so that local communities can hold their councils to account”

8) White Paper 1.39 “Therefore we propose to amend and add to national policy to make clear that: authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including: – making effective use of suitable brownfield sites and the opportunities offered by estate regeneration; – the potential offered by land which is currently underused, including surplus public sector land where appropriate; – optimising the proposed density of development; and – exploring whether other authorities can help to meet some of the identified development requirement.”

9) I feel that in these White Paper proposals, there is a suggestion that Local Authorities have not had enough guidance on what constitutes “Exceptional circumstances”. The paper proposes that the definition of “Exceptional circumstances” should be clarified so that it can be quite clear that the wrong decisions have not been taken. I suggest that this may be the case with Kirklees and that when new Government guidelines are published, it might indicate that some Green Belt areas should be retained.

10) I would suggest that in view of the Government’s proposals to review the “Exceptional circumstances” definition, it would be appropriate, when this clarification has been published, to re-examine the proposed release of Green Belt sites.

11) **(Regarding matter 2 (question i)** In addition, I would like to mention the Kirklees Local Plan Submission Documents SD1 Kirklees Publication Draft Local Plan Strategy and Policies, Appendix 3 Housing Delivery and Phasing Table (see below) These tables show a projection of the sites for housing with phasing of delivery between 2013/14 and 2030/31. Some Green Belt sites are (rightly in my view) placed at the latter end of the delivery period. To give an example, site H591 is a Green Belt site in Gomersal. The table shows the projected time span for delivery to be between 2026 and 2031. Yet, at present, developers, through their agents Carter Jonas, have presented pre application plans and documents to Kirklees with a view to commencing the development as soon as possible stating that the site is “available now” (PUBLICATION DRAFT KIRKLEES LOCAL PLAN (NOV 2016) SITE H591 LAND TO THE WEST OF CLIFFE MOUNT, FERRAND LANE, GOMERSAL For KCS Development Ltd 4.1.1”

Their Presentation Document states:

“4.1.33 Paragraph 47 of NPPF states that for a site to be ‘achievable’ there should be a reasonable prospect that housing will be delivered on the site within five years and in particular, the site is viable. It is considered that the site is achievable and that there are no insurmountable constraints that would prevent the deliverability of the site.”

12) As I understand it, until the end of the Examination Period and the presentation of the concluding report by the Inspectors, Green Belt land is not in a position to be released and to be made available.

13) However, there are many Green Belt sites which do appear in the first stage of the Delivery and Phasing Table. Question (i) asks, "Does Policy PLP 3 provide a clear framework on locational requirements, in line with paragraph 154 in the NPPF? Does the policy give sufficient recognition to the protection of the Green Belt and the countryside? I would suggest that positioning Green Belt sites in the earlier part of the Phasing Table is not appropriate.

Accordingly, applications for building on Green Belt should not be approved for commencement at an earlier date, when Brownfield sites should be being prioritised.

14) It is important that housing on Brownfield sites should be a priority but this is not always straightforward. Similarly, windfall allowances have been factored in but those numbers are also uncertain.

15) Criterion 2c is mentioned in the same question. It is clear that there is an expectation that the delivery of Brownfield sites be realised earlier in the plan. It could be that if the figures for Brownfield sites and also windfall allowance sites turn out to be higher than anticipated, during the early delivery stages, and if Green Belt sites have not been prioritised then it should be possible to re-consider some of the Green Belt decisions.

16) I would suggest that:

- i) the approval for release of Green Belt sites be deferred until there is clarification on the matter of "exceptional circumstances"
- ii) Green Belt sites are allocated positions in the latter stages of the Delivery and Phasing timescale

17) To conclude: To quote again from the White Paper:

"The Green Belt is highly valued by communities, particularly those on the edge of urban areas."

I feel that this value should not be regarded too lightly. It would not be appropriate for Green Belt to be released for development until it is certain that all the primary means outlined by the Government have been used in aiming for housing targets and by such time as "Exceptional Circumstances" have been clarified by the Government.

From

Linda Smith

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