



Kirklees Local Plan Examination

Stage 1 – Initial Hearings

Hearing Statement

**Submitted on behalf of Upper
Dearne Valley Environmental
Trust (registered charity number
1157540)**

**Matter 8 – Approach to Site
Allocations and Greenbelt
Release**

September 2017

Matter 8 – Approach to site allocation 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?

1. The Upper Dearne Valley Environmental Trust have already submitted representations in relation to this issue and trust that the Inspector has these representations and will take them in to consideration. However, the Upper Dearne Valley Environmental Trust wish to make the following additional comments in relation to the specific Questions raised by the Inspector. The Upper Dearne Valley Environmental Trust also wish to speak at the hearing in relation to Matter 8. Specific matters relating to proposed allocations H3325a and E2333a will be addressed at Stage 4 and the Upper Dearne Valley Environmental Trust will be participating in this stage as well.
2. Matter 8 – question (a)
 - 2.1 The Upper Dearne Valley Environmental Trust believe that the Council have failed to undertake a robust and comprehensive assessment of development capacity within the existing urban areas and other areas outside of the Green Belt.
 - 2.2 The Upper Dearne Valley Environmental Trust consider that if the Council were to look properly at the available development capacity within the existing urban areas they would find that their aspiration to have a brownfield first approach to development could be achieved and the precious Green Belt could be maintained. The Upper Dearne Valley Environmental Trust believe that there is a total under estimation on the part of the Council of the brownfield land supply and therefore an over estimation of the necessity for green field allocations and the necessary green belt releases.
3. Matter 8 – question (b)
 - 3.1 The Green Belt is a finite resource and should be preserved. The draft Local Plan does not do this.
 - 3.2 The Upper Dearne Valley Environmental Trust do not consider that exceptional circumstances have been demonstrated to justify the release of Green Belt land to accommodate some 11,500 new dwellings and additional employment uses.
 - 3.3 How can exceptional circumstances exist to release sites such as E2333a from the Green Belt to meet a purported employment need when the adjacent current employment land (H3325a) is being reallocated for housing?

4. Matter 8 – question (d)

- 4.1 The Upper Dearne Valley Environmental Trust do not consider that the Council's approach to assessing potential sites in the Green Belt for development is soundly based.
- 4.2 The Green Belt review was not robust or justified.