

Kirklees Draft Local Plan: Summary of comments and the Council's Responses

Green Belt Review and Outcomes Report

This report provides the number of comments made (Support, Conditional Support, Object and No Comment) on the Draft Local Plan Consultation (November 2015 - February 2016) and summary of these comments and the Council's response, including proposed changes to the Local Plan. Comment references are listed - full details of each comment are available at www.kirklees.gov.uk/localplan

Summary of comments	Council Response
<p>Add to Green Belt - AGB2067</p> <p>DLP_GBR194, DLP_GBR221</p> <p>The summary of the representation(s) is available in the Allocations and Designations Consultation report</p>	<p>Support 0 Object 2 No Comment 0</p> <p>The response to the representation(s) received is available in the Allocations and Designations Consultation report</p>
<p>Add to Green Belt - AGB2072</p> <p>DLP_GBR113</p> <p>The summary of the representation(s) is available in the Allocations and Designations Consultation report</p>	<p>Support 1 Object 0 No Comment 0</p> <p>The response to the representation(s) received is available in the Allocations and Designations Consultation report</p>
<p>Add to Green Belt - AGB2074</p> <p>DLP_GBR10, DLP_GBR78, DLP_GBR80, DLP_GBR83, DLP_GBR87, DLP_GBR125, DLP_GBR141, DLP_GBR153, DLP_GBR167, DLP_GBR168, DLP_GBR227, DLP_GBR228, DLP_GBR229, DLP_GBR230, DLP_GBR232, DLP_GBR236, DLP_GBR237</p> <p>The summary of the representation(s) is available in the Allocations and Designations Consultation report</p>	<p>Support 17 Object 0 No Comment 0</p> <p>The response to the representation(s) received is available in the Allocations and Designations Consultation report</p>
<p>Add to Green Belt - AGB2701</p> <p>DLP_GBR19</p> <p>The summary of the representation(s) is available in the Allocations and Designations Consultation report</p>	<p>Support 0 Object 1 No Comment 0</p> <p>The response to the representation(s) received is available in the Allocations and Designations Consultation report</p>
<p>Add to Green Belt - AGB2705</p> <p>DLP_GBR130</p> <p>The summary of the representation(s) is available in the Allocations and Designations Consultation report</p>	<p>Support 0 Object 1 No Comment 0</p> <p>The response to the representation(s) received is available in the Allocations and Designations Consultation report</p>
<p>Advertised Change - 0411_01</p> <p>DLP_GBR251, DLP_GBR252</p> <p>The proposed boundary between no. 58 and no. 62 Mount Road is not a suitable green belt boundary as it is marked by a wire fence which may be subject to change. The boundary has been planted with trees. No. 62 cannot be removed from the green belt as this would create a pocket of land which was not green belt in the green belt.</p> <p>With the green belt bisecting the garden of no. 58 it is unclear to any owner where the boundary lies since outwardly the whole area appears to be one single garden. The previously agreed position of the green belt boundary was the rear (west) boundary of Orchard Barn and the boundary did not make the eastward step indicated by the draft Local Plan green belt boundary.</p>	<p>Support 0 Object 2 No Comment 0</p> <p>No change No.62 is a new dwelling that was granted planning permission in 1999 because of the existence of a previous extant permission. The new curtilage for no. 62 is well proportioned, reasonably small scale and clearly domestic in character. It is not isolated nor detached from the settlement. There is no reason to suggest that it should not be included within the settlement boundary and there is no need to keep this parcel of land permanently open. A domestic curtilage boundary planted with trees is considered to be a suitably permanent feature for the position of a green belt boundary.</p> <p>Proposed change Correct the draft Local Plan green belt boundary to remove the eastward step immediately south of Orchard Barn.</p> <p>Reason No change to the position of the statutory green belt boundary is intended in this location.</p>
<p>Advertised Change - 0411_03</p> <p>DLP_GBR58, DLP_GBR59</p>	<p>Support 0 Object 2 No Comment 0</p>

Summary of comments	Council Response
Officer proposed amendment.	Proposed change The decision to amend the green belt boundary in this location will be reversed. This will appear in the revised Green Belt Review and Outcomes report published as part of the Publication draft Local Plan.
Advertised Change - 1612_01	Support 1 Object 0 No Comment 0
DLP_GBR189	
Agreement that this is a minor change which reflects boundary changes over the last 20 years.	No change. Support noted.
Advertised Change - 1612_02	Support 1 Object 0 No Comment 0
DLP_GBR190	
Agreement that this is a minor change which reflects boundary changes over the last 20 years.	No change. Support noted.
Advertised Change - 1612_03	Support 0 Object 10 No Comment 0
DLP_GBR57, DLP_GBR65, DLP_GBR74, DLP_GBR90, DLP_GBR126, DLP_GBR152, DLP_GBR154, DLP_GBR193, DLP_GBR220, DLP_GBR248	
The proposed new green belt boundary does not follow a physical feature on the ground. The area is the edge of a field and follows a post and wire fence that was erected about 12 months ago and is unlikely to be permanent. It is contrary to the NPPF which states that boundaries must be clearly defined using features that are readily recognisable and likely to be permanent. The strip of land could be used to introduce a road to increase the size of the Beech Farm development. There are no natural features that need protection.	No change The position of the green belt boundary in this location is intended to follow the eastern boundary of the property known as Manor Barn and clearly separates land used as garden curtilage from the paddock/agricultural land to the east. The boundary for the most part follows a stone garden wall which is an appropriate permanent feature for a green belt boundary.
Advertised Change - 1712_01	Support 1 Object 0 No Comment 0
DLP_GBR192	
Agreement that this is a minor change which reflects boundary changes over the last 20 years.	No change. Support noted.
Advertised Change - 1712_02	Support 1 Object 0 No Comment 0
DLP_GBR191	
Agreement that this is a minor change which reflects boundary changes over the last 20 years.	No change. Support noted.
Advertised Change - 2026_01	Support 0 Object 1 No Comment 0
DLP_GBR6	
The proposed change to this section of the plan leaves the area of land to the north of Gomersal Primary School unviable for farming in any capacity. This area has good access from the main road and could be used for developing either small retirement bungalows or low cost housing which would have access to the school and recently opened store. The boundary should be moved northwards to the edge of the tree area which constitutes part of the garden for Pollard Hall.	No change. The existing Unitary Development Plan green belt boundary in this location bisects the Gomersal Primary School building such that part of the school building as well as part of the grounds used for car parking and associated uses are within the green belt. The change proposed by 2026_01 would remove this part of the school from the green belt. As the proposed change affects only land that is currently associated with the school it is not accepted that the change would have an affect on the viability of neighbouring farmland, nor is the viability of an agricultural unit a reason for removing land from the green belt.
Advertised Change - 2510_01	Support 0 Object 1 No Comment 0
DLP_GBR53	
The Green Belt Review shows an area removed from the green belt when the change is actually adding land to the green belt.	Proposed change The 'area removed from the green belt' will be corrected to 'area added to the green belt'.
Advertised Change - 2510_02	Support 0 Object 1 No Comment 0
DLP_GBR250	
The Green Belt Review shows an area removed from the green belt when the change is actually adding land to the green belt.	Proposed change The area added to the green belt will be deleted as no change is intended from the original position of the green belt boundary. The area removed from the green belt will be retained, but with an amended area.

Summary of comments	Council Response					
Advertised Change SFC - 2424_01_SFC752	Support	1	Object	0	No Comment	0
DLP_GBR94						
The reason given for the advertised change to the green belt boundary is supported.	Proposed change. Support noted. However, the decision to accept this change to the position of the green belt boundary has been reversed following consideration of whether any exceptional circumstances exist that would warrant such a change. This revised analysis will be published as part of the Publication Draft Local Plan revised Green Belt Review and Outcomes report.					
Green Belt Edge - AS4	Support	0	Object	1	No Comment	0
DLP_GBR202						
The overall assessment of the Green Belt Review concludes that, in principle, it would be appropriate for land at AS3, AS4 and AS5 to be released from the Green Belt. The conclusions it makes in the cases of areas AS4 and AS5 appear to be based on the expectation of some visual (or physical) containment of these proposed housing sites by the existing landform, which would appear to run counter to the principle of openness already embedded in the Green Belt designation itself. Edge AS4 at Bradley Park Golf Club represents the core of the proposed housing allocations. In the analysis matrix it is suggested that its proximity to the Green Belt within Calderdale, and specifically influenced by the presence of Bradley Wood, would ensure that no merger of the 2 towns (Huddersfield and Brighouse) would result. However, as is the case with AS3 this would appear not to be the case given that there are similar proposals within the adjoining Calderdale authority to release land for housing allocation purposes within the Woodhouse Lane area of Brighouse.	No change. The proximity of Calderdale is acknowledged at test 2a (prevents merging) but it is maintained that there is sufficient width in the gap to accommodate some settlement extension without fundamentally undermining the role and function of the green belt in this location.					
Green Belt Edge - AS5	Support	0	Object	1	No Comment	0
DLP_GBR203						
The overall Green Belt Review assessment concludes that, in principle, it would be appropriate for land at AS3, AS4 and AS5 to be released from the Green Belt. The conclusions it makes in the cases of areas AS4 and AS5 appear to be based on the expectation of some visual (or physical) containment of these proposed housing sites by the existing landform, which would appear to run counter to the principle of openness already embedded in the Green Belt designation itself. Edge AS5 forms the highest part of these combined sites and would be particularly visible. While not allocated for housing this would form the most practical site for the new motorway junction 24a (transport scheme TS2). The analysis matrix makes no reference to this major scheme.	No change. The conclusion for edge assessment AS5 states that development could be contained by landform and need not be visually prominent. Development north from Bradley Road that kept below the ridge line would maintain the undeveloped edge that is prominent from the motorway. The green belt assessment does not refer to Local Plan Transport Scheme TS2 (potential new motorway junction 24a) as a proposed future transport scheme whose land take is not yet determined is not considered to represent a constraint to new development at this time.					
Green belt edge AS5 is incorrectly drawn. The existing position takes no account of the proposed new motorway junction 24a (TS2) and a more robust green belt boundary for the long term would be the M62 motorway.	No change. It is acknowledged that the motorway would present an acceptable new green belt boundary and does so elsewhere in the district. However, there is nothing to suggest that the current position of the boundary, which follows rear garden boundaries, is incorrectly drawn, nor that it could not endure beyond the life of the plan. The Green Belt Review is not a general review of the position of the boundary, nor is it a 'drawing back' exercise. The correct judgement of the position of the boundary is through the assessment of site options in this area and a new green belt boundary would be found should a site be accepted for development. Otherwise, no exceptional circumstances exist that would justify moving the boundary from its current position. There is no requirement to remove land from the green belt in order to facilitate the transport scheme (TS2).					
Green Belt Edge - B/EB13	Support	0	Object	1	No Comment	0
DLP_GBR159						
The amber assessment for test 1c relating to environmental constraints is unduly lenient as the issues of noise and air quality cannot be adequately mitigated while still making an efficient use of land.	No change. The Green Belt Review at test 1c acknowledges the presence of the noise and air quality constraint and is correct to do so. The amber assessment indicates that while present, it may not be a severe or absolute constraint and it is a matter for individual air quality and noise assessments to determine whether any parcel of land is suitable for housing development.					

Summary of comments	Council Response			
<p>Green Belt Edge - B/EB15</p> <p>DLP_GBR140, DLP_GBR160, DLP_GBR225</p> <p>The evidence contained in the Green Belt Review for edge B/EB15 demonstrates that removal of land from the green belt in this location would result in negligible conflict with Green Belt purposes and would have limited impact on openness.</p> <p>The amber assessment for test 1c relating to environmental constraints is unduly lenient as the issues of noise and air quality cannot be adequately mitigated while still making an efficient use of land.</p>	<p>No change</p> <p>Support for the assessment of B/EB15 is noted.</p>	<p>Support 2</p>	<p>Object 1</p>	<p>No Comment 0</p>
<p>Green Belt Edge - B/EB18</p> <p>DLP_GBR11, DLP_GBR139</p> <p>The green belt boundary in the vicinity of H2608 has been incorrectly drawn and should follow the line of the watercourse to the east in order to create a green belt boundary that will endure beyond the end of the plan period. The safeguarded land to the south will follow this boundary, and the allotments to the north should also be removed from the green belt.</p>	<p>No change.</p> <p>It is acknowledged that the watercourse would present a defensible green belt boundary and there are many examples in the district of boundaries following watercourses. However, there is nothing to suggest that the current position of the boundary, which follows the garden boundaries of houses off Old Lane and Russell Grove, is incorrectly drawn, nor that it could not endure beyond the life of the plan. The accepted safeguarded land option to the south is a draft accepted option. A site cannot be well related to the settlement if it would also require the removal of an area the size of the allotments, which is not much smaller than the housing site, from the green belt in order to create a defensible long term boundary. The green belt review is not a general review of the position of the boundary, nor is it a 'drawing back' exercise. The correct judgement of the position of the boundary is through the assessment of site H2608 and a new green belt boundary would be found should the site be accepted for housing development. Otherwise, no exceptional circumstances exist that would justify moving the boundary from its current position.</p>	<p>Support 1</p>	<p>Object 1</p>	<p>No Comment 0</p>
<p>The West Yorkshire Archaeology Advisory Service strongly welcomes the recognition of the importance of protecting the setting of Adwalton Moor battlefield in the scoring of this area of green belt edge review.</p> <p>This area of green belt edge is incorrectly assessed as (5) as it is not a function of the green belt to preserve the setting of heritage assets. There is no relationship between the site (H2608) and the registered battlefield.</p>	<p>No change. Support noted.</p> <p>No change.</p> <p>Paragraph 4.20 of the Green Belt Review states that one of the purposes of the green belt is to 'preserve the setting and special character of historic towns'. The paragraph acknowledges that there are no such historic towns in Kirklees, but states that the district does contain a significant number of historic features and where relevant these have been noted in test 2d, scoring either 'green' or 'amber'. In only two areas of the district has the score been 'red' indicating that the presence of an historic asset has been afforded significant weight. These are the area associated with the Adwalton Moor historic battlefield at Birkenshaw and Castle Hill in Huddersfield, which is a scheduled ancient monument. Both these assessments followed comment from Historic England.</p>	<p>Support 0</p>	<p>Object 1</p>	<p>No Comment 0</p>
<p>Green Belt Edge - BS12</p> <p>DLP_GBR161</p> <p>The amber assessment for test 1c relating to environmental constraints is unduly lenient as the issues of noise and air quality cannot be adequately mitigated while still making an efficient use of land.</p>	<p>No change.</p> <p>The Green Belt Review at test 1c acknowledges the presence of the noise and air quality constraint and is correct to do so. The amber assessment indicates that while present, it may not be an absolute constraint and it is a matter for individual air quality and noise assessments to determine whether any parcel of land is suitable for housing development.</p>	<p>Support 0</p>	<p>Object 1</p>	<p>No Comment 0</p>
<p>Green Belt Edge - BW1</p> <p>DLP_GBR238</p> <p>The green belt edge has been incorrectly assessed as playing a strategic role in helping to prevent the merger of settlements. Carlinghow forms part of the wider urban mass containing Batley, Dewsbury, Heckmondwike and Liversedge and is not therefore a separate distinct settlement. The ring of green belt land around Birstall has already been significantly breached by development along the Bradford Road corridor. If the settlements are already merged then the green belt no longer serves the purpose of</p>	<p>No change.</p> <p>While it is acknowledged that the eastern end of this site sits within Carlinghow, which is not a distinct settlement as it has been incorporated into Batley, the site is sufficiently large that the western end sits within Birstall. It is also acknowledged that there is existing development along Ealand Road as well as to the east of Bradford Road so that Birstall and Batley are to some extent already joined, and that there is existing ribbon</p>	<p>Support 0</p>	<p>Object 1</p>	<p>No Comment 0</p>

Summary of comments

preventing neighbouring towns from merging into one another. The site forms infill development. Any physical link to the wider green belt has been cut by development on Smithies Moor Lane and the essential characteristic of openness has been lost.

Council Response

development to the east of Smithies Moor Lane which cuts this site off from the wider green belt to the west. However, the green belt designation prevents reinforcement of the ribbon development and crucially maintains a lack of depth to development along Smithies Moor Lane. Any sense or glimpse of open land to the rear of these properties does at least give the impression of the movement from one settlement to another which is important in retaining the sense of Birstall as a settlement separate from Batley.

Green Belt Edge - CK16

Support 0 Object 1 No Comment 0

DLP_GBR162

The amber assessment for test 1c relating to environmental constraints is unduly lenient as the issues of noise and air quality cannot be adequately mitigated while still making an efficient use of land.

No change.
The Green Belt Review at test 1c acknowledges the presence of the noise and air quality constraint and is correct to do so. The amber assessment indicates that while present, it may not be an absolute constraint and it is a matter for individual air quality and noise assessments to determine whether any parcel of land is suitable for housing development.

Green Belt Edge - CK18

Support 0 Object 1 No Comment 0

DLP_GBR163

The amber assessment for test 1c relating to environmental constraints is unduly lenient as the issues of noise and air quality cannot be adequately mitigated while still making an efficient use of land.

No change.
The Green Belt Review at test 1c acknowledges the presence of the noise and air quality constraint and is correct to do so. The current assessment indicates that while present, it may not be an absolute constraint and it is a matter for individual air quality and noise assessments to determine whether any parcel of land is suitable for housing development.

Green Belt Edge - CMN9

Support 1 Object 0 No Comment 0

DLP_GBR234

The green belt edge 'CMN9' is correctly assessed as '2' as development within the green belt adjacent to the edge would have a negligible conflict with green belt purposes.

No change
Support noted.

Green Belt Edge - CWS11

Support 1 Object 0 No Comment 0

DLP_GBR84

The green belt assessment recognises the physical and environmental constraints in this location.

No change
Support for the edge assessment is noted.

Green Belt Edge - D4

Support 0 Object 1 No Comment 0

DLP_GBR166

The Green Belt on the draft plan includes a large portion of established gardens. These have been in existence for over 20 years and as such pre-date the Green Belt boundary in the UDP. Exceptional circumstances therefore exist for the Council to re-assess the Green Belt boundary. These gardens are mature features of urbanisation that should not be located within the Green Belt. The boundary of the green belt should not be drawn in the middle of such long established gardens leaving half within the Green Belt and half outside. The boundary does not following a physical feature so this was either an error or the 5 tests have not been applied consistently. The gardens give site RSSGB67 a relationship with the settlement.

No change.
Paragraph 2.3 of the Green Belt Review and Outcomes report indicates that the position of the green belt boundary will in all instances be guided by paragraph 85 of NPPF and states: "however, it will not always be possible to follow a feature on the ground, for example (among others) where the boundary follows the back of a row of houses leaving gardens in the green belt. Moving the boundary in these instances could create a significant change to the extent of the green belt for which there is no justification". There are innumerable instances of the green belt including rear gardens within it. Site RSSGB67 is not required to meet the objectively assessed need for housing or other development, nor is a change to the green belt boundary necessary, so exceptional circumstances do not exist to alter the position of the green belt boundary to the rear of 10 to 16 Cockley Meadows.

Green Belt Edge - DD3

Support 0 Object 1 No Comment 0

DLP_GBR246

Green belt edge DD3 is assessed/scored 2 which means that the green belt boundary edge at this point is not particularly sensitive or of fundamental importance. This score is supported.

No change
Support noted.

Boundary DD4 is classed as 5, meaning development adjacent to this boundary would lead to a significant conflict with green belt purposes. The boundary to the west of DD4 is DD3 and there do not appear to be

Proposed change
Conclusion text for edge DD3 to be amended to "No risk of sprawl. Existing encroachment by residential uses.

Summary of comments

any obvious differences between DD4 and DD3 except that they are to either side of Tanner Wood. Both have existing housing to the north and both are used for the same agricultural use. However move from boundary DD4 through Tanner Wood to DD3 and the degree of conflict changes from a score of 5 to a score of 2, meaning development adjacent to this boundary within the green belt would lead to a degree of conflict little more than negligible. If DD4 is significant, then DD3 must also be of a very similar level. The boundary review is flawed and needs reviewing again. The scoring matrix (test 2b & 2c) is inconsistent. The conclusions for each boundary are contradictory: DD4 concludes that there will be an "impact on protected trees at Tanner Wood". Yet DD3 concludes that "Eastward extent should guard against risk of impact on protected trees at Tanner Wood".

Green Belt Edge - DD4

DLP_GBR247

Boundary DD4 is classed as 5, meaning development adjacent to this boundary would lead to a significant conflict with green belt purposes. The boundary to the west of DD4 is DD3 and there do not appear to be any obvious differences between DD4 and DD3 except that they are to either side of Tanner Wood. Both have existing housing to the north and both are used for the same agricultural use. However move from boundary DD4 through Tanner Wood to DD3 and the degree of conflict changes from a score of 5 to a score of 2, meaning development adjacent to this boundary within the green belt would lead to a degree of conflict little more than negligible. If DD4 is significant, then DD3 must also be of a very similar level. The boundary review is flawed and needs reviewing again. The scoring matrix (test 2b & 2c) is inconsistent. The conclusions for each boundary are contradictory: DD4 concludes that there will be an "impact on protected trees at Tanner Wood". Yet DD3 concludes that "Eastward extent should guard against risk of impact on protected trees at Tanner Wood".

Green Belt Edge - DE5

DLP_GBR114

The physical and environmental constraints to development within the green belt, including ancient woodlands and hedgerows and UK BAP priority habitat watercourses, have been listed for other sections of green belt edge but are missing from the constraints information for the green belt edge that is relevant to site MX1905.

Green Belt Edge - DE6

DLP_GBR215

Edge ref DE6 is stated to delineate a 'restricted gap'. While it is acknowledged that there is development along Owl Lane, the character and more open and sporadic nature of this development (relative to Chidswell and Ossett), means that development of H559 would not result in a merging effect. An undeveloped parcel of land would remain. The site is therefore considered to perform a role of lower importance in preventing built up areas merging.

Edge ref DE6 is incorrectly assessed at test 2c 'safeguards from encroachment'. This is an area of urban fringe and is visually separated by a ridge line from the landscape to the east and there are few locations where these can be seen together. Whilst the site currently demonstrates some rural characteristics in terms of its arable agricultural use and the presence of rural landscape features, it has a very limited visual relationship with the wider rural landscape to the east and is considered to perform a role of lower

Council Response

Risk of impact on protected trees at Tanner Wood".

Reason

The assessments of green belt edges DD3 and DD4 reflect the different characteristics of the green belt adjacent to the settlement edge. The assessment of DD4 as '5' is based on the relationship of the area to the wider countryside and the elevation of the prominent ridge line and slope adjacent to the settlement edge, where new development would be at high risk of resulting in the appearance of sprawl. Land west of Tanner Wood is not elevated and is contained by existing development and overlooked by it, significantly limiting its relationship to the wider countryside. It is accepted that the impact on Tanner Wood would be similar both west and east of the wood, therefore the text for both edges in relation to the wood will be made the same. Assessing both these edges as '5' would be inconsistent with assessment elsewhere in the district and fail to recognise the subtly differing characteristics of each part of the green belt.

Support 0 Object 1 No Comment 0

Proposed change

Conclusion text for edge DD3 to be amended to "No risk of sprawl. Existing encroachment by residential uses. Risk of impact on protected trees at Tanner Wood".

Reason

The assessments of green belt edges DD3 and DD4 reflect the different characteristics of the green belt adjacent to the settlement edge. The assessment of DD4 as '5' is based on the relationship of the area to the wider countryside and the elevation of the prominent ridge line and slope adjacent to the settlement edge, where new development would be at high risk of resulting in the appearance of sprawl. Land west of Tanner Wood is not elevated and is contained by existing development and overlooked by it, significantly limiting its relationship to the wider countryside. It is accepted that the impact on Tanner Wood would be similar both west and east of the wood, therefore the text for both edges in relation to the wood will be made the same. Assessing both these edges as '5' would be inconsistent with assessment elsewhere in the district and fail to recognise the subtly differing characteristics of each part of the green belt.

Support 0 Object 1 No Comment 0

No change

The Green Belt Review notes where topographical, physical or environmental constraints exist in close proximity to the settlement edge, and the accompanying 'green', 'amber' and 'red' colour indicates the degree to which these features are considered to constrain development. There is a protected sycamore close to Manor Park and a number of protected trees further to the east and their presence has been noted as part of the assessment. The ancient woodlands at Dum Wood (or Dunn Wood) and Dogloitch Wood were considered sufficiently remote not to constitute a physical or environmental constraint to development adjacent to the settlement edge. Their presence is considered in the site option MX1905. Apart from the watercourse on the Kirklees/Wakefield boundary there is no other watercourse in close proximity to the edge of Chidswell.

Support 0 Object 1 No Comment 0

No change

This site lies within an area of green belt whose role is to maintain the open areas that separate Kirklees from Wakefield and Leeds. East of Chidswell the green belt is somewhat wider, and merges with undeveloped areas within Wakefield. Development of H559 would restrict the remaining undeveloped frontage on Owl Lane to a narrow field on the Wakefield boundary so an undeveloped gap, although narrowed, would remain.

No change

One of the purposes of the green belt is to safeguard the countryside from encroachment. While it is acknowledged that there is overlooking from existing development, the undeveloped frontage to Owl Lane does have the appearance of countryside and the site forms part of the wider countryside to the east. Development of the site would restrict the remaining undeveloped frontage on Owl Lane to a narrow field on the Wakefield

Summary of comments

importance in this regard. There is no public accessibility across the site.

In the now withdrawn Kirklees Core Strategy the Windsor Farm, Chidswell site was included together with Site Ref.MX1905 as a strategic allocation, presenting evidence that the Council once considered the site as being a deliverable development site and not fulfilling Green Belt purposes. There have been no tangible changes in the site's circumstances in the intervening period which would warrant the Council's change in stance.

Edge ref DE6 is incorrectly assessed at test 2b 'checks sprawl'. The site is constrained on three sides by roads. The Green Belt Review fails to acknowledge the presence of a watercourse, and therefore potential robust green belt boundary, on the remaining boundary south east of Windsor Road which would restrict sprawl to the south.

Green Belt Edge - E6

DLP_GBR124

The green belt boundary could be amended to round off the settlement in this location.

Green Belt Edge - FL12

DLP_GBR82

The green belt boundary in the vicinity of accepted housing option H583 is incorrectly drawn.

Green Belt Edge - FL2

DLP_GBR199

Green belt edge 'FL2' is incorrectly recorded as being affected by flood zone 3a.

Green Belt Edge - FT3

DLP_GBR48, DLP_GBR49, DLP_GBR56, DLP_GBR64, DLP_GBR73, DLP_GBR89, DLP_GBR195, DLP_GBR222, DLP_GBR249

Green belt edge FT3 (3) should be reassessed as (4) in order to prevent encroachment into adjacent fields and to protect the setting of the Grade II listed St Lucius' Church whose boundary forms part of FT3.

Green belt edge FT3 is incorrectly assessed as amber (3) and should be assessed as red (5) in order to recognise the role of the green belt in preventing sprawl, to ensure protection from inappropriate development and protect the historic environment, to assist in safeguarding the countryside from

Council Response

boundary so an undeveloped gap, although narrowed, would remain. Whether the site can be accessed publicly is not relevant to the assessment of the site as countryside.

Proposed change

The conclusion for edge ref DE6 has been amended to better reflect the role and function of the green belt in this area.

Proposed change

The existing green belt boundary along Windsor Road presents a strong and clear edge to the settlement. However, it is acknowledged that the development along Chidswell Lane and the existing and proposed development on Owl Lane mean that there is no risk of sprawl to the west or east. The watercourse to the south marks the Kirklees/Wakefield boundary and although the boundary is not strong it is present. It is accepted that this feature would prevent sprawl to the south. Consequently test 2b of edge ref DE6 will be amended.

Proposed change

New 'remove small site from the green belt' option created (RSSGB117).

No change.

Scrutiny of the position of the green belt boundary appears to show that it is entirely consistent with the position of the green belt boundary shown on the Unitary Development Plan. No change to the position of the green belt boundary in this location is proposed as part of the Local Plan.

No change

Green belt edge FL2 follows the edge of the green belt from no. 62 Barnsley Road to the property known as the telephone exchange off Pinfold Lane. The extreme east of edge FL2 abuts Flockton Beck where information from the Environment Agency shows that the area is at risk of flooding (flood zones 2 and 3a). The Green Belt Review is therefore correct to note that edge FL2 is affected by flood risk. It is noted that site H191 is located on a part of edge FL2 where flood risk does not apply, but this is not the reason for the 'red' green belt assessment. This is based on the configuration of the option relative to the settlement edge which would result in a poorly related projection of development detrimental to the openness of the green belt.

No change.

The assessment of green belt edge FT3 reflects the characteristics of the green belt adjacent to the settlement edge and the pattern of field and other boundaries that could allow for limited settlement extension without undermining the role and function of the green belt. The adjacent edge FT4 (4) for comparison reflects the north/south field boundary pattern which could make any settlement extension large in relation to the size of the village unless a new southern boundary could be found. The impact of development on the setting of the listed church is consistent with the consideration of the green belt where it abuts other heritage assets throughout the district. Assessing this edge as (4) would be inconsistent with assessments elsewhere in the district and fail to recognise the differing characteristics of each part of the green belt.

No change.

The assessment of green belt edge FT3 reflects the characteristics of the green belt adjacent to the settlement edge and the pattern of field and other boundaries that could allow for limited settlement extension without

Support 0 Object 0 No Comment 1

Support 0 Object 1 No Comment 0

Support 0 Object 1 No Comment 0

Support 0 Object 9 No Comment 0

Summary of comments

Council Response

encroachment and to be consistent with the assessment of the green belt edge for the rest of the village.

undermining the role and function of the green belt. The impact of development on the setting of any adjacent listed buildings and the conservation area is consistent with the consideration of the green belt where it abuts other heritage assets throughout the district. Assessing this edge as (5) would be inconsistent with assessments elsewhere in the district and fail to recognise the differing characteristics of each part of the green belt.

Green Belt Edge - FT4

Support 0 Object 0 No Comment 1

DLP_GBR211

The green belt boundary should be amended to reflect existing field boundaries and the extent of the current planning application to redevelop Park Farm.

No change
This reflects the boundary of accepted housing option H120. The position of the green belt boundary will be amended to remove this site from the green belt, should it continue to be an accepted option.

Green Belt Edge - GS10

Support 0 Object 1 No Comment 0

DLP_GBR158

The green belt review should be amended to reflect the fact that not all of the land beyond edge GS10, including rejected option H193, is constrained by environmental issues including the powerline and M62. There is no evidence to suggest that the adjacent small holding would be a bad neighbour. The outcome of test 2c should be amended to green.

No change.
Green belt edge GS10 includes land abutting the motorway embankment, land affected by the presence of a high voltage power line and farm buildings and it would be inconsistent with assessments elsewhere in the district not to acknowledge their presence. The current assessment indicates that while present, they are not regarded as an absolute or severe constraint to development. The individual assessment of each development option takes into account the degree to which a site is affected by the presence of any constraint noted in the Green Belt Review.

Green Belt Edge - GS13

Support 0 Object 1 No Comment 0

DLP_GBR8

Strong disagreement with subjective assessment at test 2c of the green belt review which states that a site has 'limited visual relationship with the wider countryside' and with the conclusion which states that 'development will have limited impact on openness'.

No change.
It is acknowledged that any new development will impact on openness and this is a normal consideration for any proposal that relates to building in the green belt. The green belt assessment is by its very nature subjective, but impact on openness can be guided by degree of containment, degree of urban fringe development and potential for strong new boundaries. In the case of green belt edge GS13, which relates to land both north and south of Ferrand Lane, regard was had to the existing settlement pattern, including how new development could relate to existing built form in the green belt, and the potential for strong new green belt boundaries to be found. South of Ferrand Lane new development would be contained on three sides; by the existing settlement on two sides and be a significant amount of built form in the green belt on the third. On the fourth, Ferrand Lane would provide a strong new boundary. While visually linked with countryside across Ferrand Lane, the degree of containment limits the relationship with that countryside. This assessment is consistent with other areas in the district and acknowledges the contribution that each area makes to the overall role and function of the green belt.

Green Belt Edge - GS7

Support 0 Object 1 No Comment 0

DLP_GBR240

GS7 should be divided into two; the western half being assessed as amber to reflect the degree of constraint associated with protected trees that can be designed around, and the eastern half which should reflect the higher degree of constraint associated with Oakwell Hall Country Park.

No change
Paragraph 4.6 of the Green Belt Review states that for tests 1b and 1c 'physical and environmental constraints' the presence of features, including protected trees, and the degree to which they would be considered to inhibit development is considered. The western section of edge GS7 referred to abuts an area of green belt occupied by a Tree Preservation Order Area, protecting trees in their parkland setting. The assessment of this edge as a black 'constrained' edge is entirely consistent with assessment elsewhere in the district and to amend the assessment would fail to recognise the degree of constraint along this part of the green belt edge. In compliance with the site assessment methodology, each proposed development site was assessed for the impact removing the site would have on the role and function of the green belt. The site being assessed (H231) included that part of the TPO area west of the drive to The Wheatley's and the green belt in this location protects the openness and setting of this sensitive environmental area. Whether or not it is physically possible to design a scheme around the trees does not make the removal of the site from the green belt necessary, when less environmentally sensitive alternatives are available.

Summary of comments	Council Response					
Green Belt Edge - HF31	Support	0	Object	1	No Comment	0
DLP_GBR122						
The green belt boundary to the rear of School Street Netherthong should be redrawn so as to round off the settlement in this location. The new boundary would run in a straight line so could be plotted with accuracy although it does not follow any feature on the ground. The eastern edge of New Road provides a very defined containment feature to the urban area.	Proposed change New 'remove small site from the green belt' option created (RSSGB119).					
Green Belt Edge - HH1	Support	0	Object	1	No Comment	0
DLP_GBR181						
Green belt edge HH1, along with HH2, HH3, HH4, HH5 and HH6 should be preserved and strengthened. They are of utmost importance in regards to each of the green belt purposes.	No change. Green belt edge HH1 is considered to be severely constrained by the degree of slope to the immediate west and it is therefore very unlikely that a satisfactory settlement extension could be found that would not undermine the role and function of the green belt in this location.					
Green Belt Edge - HH2	Support	0	Object	1	No Comment	0
DLP_GBR182						
Green belt edge HH2, along with HH1, HH3, HH4, HH5 and HH6 should be preserved and strengthened. They are of utmost importance in regards to each of the green belt purposes.	No change. Green belt edge HH2, along with edge HH3, is assessed as pink (5) and is considered to play an important green belt role. The assessment recognises that the existing settlement pattern, topography and lack of potential new boundary features could result in a settlement extension that risked significant impact on the openness of the green belt.					
Green Belt Edge - HH3	Support	0	Object	1	No Comment	0
DLP_GBR185						
HH3, along with HH1, HH2, HH4, HH5 and HH6 should be preserved and strengthened. They are of utmost importance in regards to each of the green belt purposes.	No change. Green belt edge HH3, along with edge HH2, is assessed as pink (5) and is considered to play an important green belt role. The assessment recognises that the existing settlement pattern, topography and lack of potential new boundary features could result in a settlement extension that risked significant impact on the openness of the green belt.					
Green Belt Edge - HH4	Support	0	Object	1	No Comment	0
DLP_GBR186						
HH4, along with HH1, HH2, HH3, HH5 and HH6 should be preserved and strengthened. They are of utmost importance in regards to each of the green belt purposes.	No change. Green belt edge HH4 is assessed as constituting a strategic gap separating Hartshead from Roberttown where any settlement extension would fundamentally undermine the role and function of the green belt in this location.					
Green Belt Edge - HH5	Support	0	Object	1	No Comment	0
DLP_GBR187						
HH5, along with HH1, HH2, HH3, HH4 and HH6 should be preserved and strengthened. They are of utmost importance in regards to each of the green belt purposes.	No change. Green belt edge HH5, along with edge HH6, has been assessed as green (2), meaning that settlement extension, infill or rounding off could be achieved without significantly undermining the role and function of the green belt. The assessment is based on the existing settlement pattern and land use features in the green belt that could contain new development and prevent sprawl and limit encroachment into the countryside. Assessing each edge as pink (5) would be inconsistent with assessments elsewhere in the district and would fail to recognise the differing characteristics of each part of the green belt.					
Green Belt Edge - HH6	Support	0	Object	1	No Comment	0
DLP_GBR188						
HH6, along with HH1, HH2, HH3, HH4 and HH5 should be preserved and strengthened. They are of utmost importance in regards to each of the green belt purposes.	No change. Green belt edge HH6, along with edge HH5, has been assessed as green (2), meaning that settlement					

Summary of comments

Council Response

Summary of comments	Council Response	Support	Object	No Comment
	extension, infill or rounding off could be achieved without significantly undermining the role and function of the green belt. The assessment is based on the existing settlement pattern and land use features in the green belt that could contain new development and prevent sprawl and limit encroachment into the countryside. Assessing each edge as pink (5) would be inconsistent with assessments elsewhere in the district and would fail to recognise the differing characteristics of each part of the green belt.	0	1	0
Green Belt Edge - HP6		0	1	0
DLP_GBR116				
The green belt boundary between Rakes Bridge House and Rakes Bridge should be redrawn so as to round off the settlement in this location. This would be a straight line boundary from Rakes Bridge House to the junction of Main gate and Foster Place Lane. Fencing could be used to identify the boundary and the land to be removed would be seen against the backdrop of woodland to the east of Rakes Dike.	Proposed change New 'remove small site from the green belt' option created (RSSGB120).			
Green Belt Edge - KH4		0	1	0
DLP_GBR245				
An area of Provisional Open Land in the centre of Kirkburton has already been allocated for new development of 120 houses. The redrawing of the boundary to KH6 would add green belt land capable of another 20-30 houses. KH6 has no access except onto the beginning of Turnshaw Road adjacent to a sharp and dangerous bend. KH4 is an area of land many times KH6. Although traffic may increase on Linfit Lane leading to Long Lane for commuters to work, that same traffic will grid-lock the village centre of Kirkburton and add to the peak time crawl along Penistone Road.	No change The Green Belt Review assesses the edge of the green belt and land immediately beyond it for its contribution to green belt purposes and the potential harm that could be caused to the green belt should land be removed from it. The first stage of the test, as set out in paragraph 4.3 of the Green Belt Review and Outcomes report, identified lengths of green belt boundary which are constrained to the point where there is no reasonable prospect of development taking place in the green belt adjoining the current boundary. This test did not include the ability of land to gain access to the highway network, or whether the surrounding highway network was capable of accommodating additional traffic. Site access is part of the technical assessment of potential development sites and has been considered in accordance with the site allocation methodology. Whether the surrounding highway network is capable of accommodating additional traffic has been considered through the Transport Model.			
Green Belt Edge - KH6		0	1	0
DLP_GBR244				
An area of Provisional Open Land in the centre of Kirkburton has already been allocated for new development of 120 houses. The redrawing of the boundary to KH6 would add green belt land capable of another 20-30 houses. KH6 has no access except onto the beginning of Turnshaw Road adjacent to a sharp and dangerous bend.	No change The Green Belt Review assesses the edge of the green belt and land immediately beyond it for its contribution to green belt purposes and the potential harm that could be caused to the green belt should land be removed from it. The first stage of the test, as set out in paragraph 4.3 of the Green Belt Review and Outcomes report, identified lengths of green belt boundary which are constrained to the point where there is no reasonable prospect of development taking place in the green belt adjoining the current boundary. This test did not include the ability of land to gain access to the highway network, or whether the surrounding highway network is capable of accommodating additional traffic. Site access is part of the technical assessment of potential development sites and has been considered in accordance with the site allocation methodology. Whether the surrounding highway network is capable of accommodating additional traffic has been considered through the Transport Model. It should be noted that no development options have been received for land adjacent to KH6.			
Green Belt Edge - LN11		1	0	0
DLP_GBR223				
The conclusion of LN11 that there is potential to round off the green belt boundary to exclude the cricket ground, church, housing fronting Church Lane and possibly Colne Valley High School is supported. These areas do not perform a green belt purpose.	Comment noted.			
Green Belt Edge - LN12		1	0	0
DLP_GBR224				
The conclusion of LN12 that there is potential to round off the green belt boundary to exclude the cricket ground, church, housing fronting Church Lane and possibly Colne Valley High School is supported. These areas do not perform a green belt purpose.	Comment noted.			

Summary of comments	Council Response			
<p>Green Belt Edge - MF16</p> <p>DLP_GBR170</p> <p>Green belt boundaries which border the A62 should be preserved and strengthened. They are of utmost importance with regard to the purposes of including land in the green belt and preserve the setting of Hartshead, Roberttown and the north western edge of Mirfield. They should all be assessed as having a maximum level of importance (a score of '5' as per the assessment matrix).</p>		Support 0	Object 1	No Comment 0
<p>Green Belt Edge - MF17</p> <p>DLP_GBR171</p> <p>Green belt boundaries which border the A62 should be preserved and strengthened. They are of utmost importance with regard to the purposes of including land in the green belt and preserve the setting of Hartshead, Roberttown and the north western edge of Mirfield. They should all be assessed as having a maximum level of importance (a score of '5' as per the assessment matrix).</p>		Support 0	Object 1	No Comment 0
<p>Green Belt Edge - MF18</p> <p>DLP_GBR172</p> <p>Green belt boundaries which border the A62 should be preserved and strengthened. They are of utmost importance with regard to the purposes of including land in the green belt and preserve the setting of Hartshead, Roberttown and the north western edge of Mirfield. They should all be assessed as having a maximum level of importance (a score of '5' as per the assessment matrix).</p>		Support 0	Object 1	No Comment 0
<p>Green Belt Edge - MF21</p> <p>DLP_GBR173</p> <p>Green belt boundaries which border the A62 should be preserved and strengthened. They are of utmost importance with regard to the purposes of including land in the green belt and preserve the setting of Hartshead, Roberttown and the north western edge of Mirfield. They should all be assessed as having a maximum level of importance (a score of '5' as per the assessment matrix).</p>		Support 0	Object 1	No Comment 0
<p>Green Belt Edge - RT1</p> <p>DLP_GBR174</p> <p>RT1 prevents Roberttown merging with Hartshead as identified in the Green Belt Review and Outcomes Report.</p>	No change. Comment noted.	Support 0	Object 1	No Comment 0
<p>Green Belt Edge - RT2</p> <p>DLP_GBR175</p> <p>Green belt edge RT2, along with RT3 and RT4 prevent the outward sprawl of Roberttown and prevent encroachment westward towards the historic Little Thorpe/Fall Farm, Moor Top and Taylor Hall settlements. These boundaries play a vital role in preserving the setting and historic character of Roberttown and should be assessed as being of the utmost importance in regard to the purposes of the green belt.</p>	No change. The assessments of green belt edges RT2, RT3 and RT4 reflect the different characteristics of the green belt adjacent to the settlement edge. The assessment of RT2 as amber (3) reflects the pattern of the existing settlement and the field boundaries within the green belt which could form potential new boundaries, all of which would allow for some limited rounding off of the settlement without fundamentally undermining the purposes of including land in the green belt. The assessment of RT3 as pink (5) highlights its specific importance in preventing the westward sprawl of Roberttown which would risk merger with the overwashed development. Assessing all these edges as pink (5) would be inconsistent with assessment elsewhere in the district and fail to	Support 0	Object 1	No Comment 0

Summary of comments

Council Response

Green Belt Edge - RT3

Support 0 Object 1 No Comment 0

DLP_GBR176

Green belt edge RT3, along with RT2 and RT4 prevent the outward sprawl of Roberttown and prevent encroachment westward towards the historic Little Thorpe/Fall Farm, Moor Top and Taylor Hall settlements. These boundaries play a vital role in preserving the setting and historic character of Roberttown and should be assessed as being of the utmost importance in regard to the purposes of the green belt.

No change.
The assessments of green belt edges RT2, RT3 and RT4 reflect the different characteristics of the green belt adjacent to the settlement edge. The assessment of RT2 as amber (3) reflects the pattern of the existing settlement and the field boundaries within the green belt which could form potential new boundaries, all of which would allow for some limited rounding off of the settlement without fundamentally undermining the purposes of including land in the green belt. The assessment of RT3 as pink (5) highlights its specific importance in preventing the westward sprawl of Roberttown which would risk merger with the overwashed development. Assessing all these edges as pink (5) would be inconsistent with assessment elsewhere in the district and fail to recognise the subtly differing characteristics of each part of the green belt.

Green Belt Edge - RT4

Support 0 Object 1 No Comment 0

DLP_GBR177

Green belt edge RT4 along with RT2 and RT3 prevent the outward sprawl of Roberttown and prevent encroachment westward towards the historic Little Thorpe/Fall Farm, Moor Top and Taylor Hall settlements. These boundaries play a vital role in preserving the setting and historic character of Roberttown and should be assessed as being of the utmost importance in regard to the purposes of the green belt. RT4 also plays a role in prevent any further outward encroachment towards site MX1929 which would result in the merging of Roberttown with Mirfield.

No change.
The assessments of green belt edges RT2, RT3 and RT4 reflect the different characteristics of the green belt adjacent to the settlement edge. The assessment of RT2 as amber (3) reflects the pattern of the existing settlement and the field boundaries within the green belt which could form potential new boundaries, all of which would allow for some limited rounding off of the settlement without fundamentally undermining the purposes of including land in the green belt. The assessment of RT3 as pink (5) highlights its specific importance in preventing the westward sprawl of Roberttown which would risk merger with the nearby overwashed development. Assessing all these edges as pink (5) would be inconsistent with assessment elsewhere in the district and fail to recognise the differing characteristics of each part of the green belt.

Green belt edge RT4 should be assessed as 'red' (strategic gap) to reflect its role in preventing the outward encroachment of Roberttown and the merging of Roberttown with Mirfield.

No change.
Green belt edge RT4 is contiguous with edge RT5 which is assessed as 'red' (strategic gap) to reflect its role in preventing the merger of Roberttown with Mirfield. It is considered that there is a distinct difference between the two edges based on the existing settlement pattern and land use features within the green belt. Adjacent to edge RT4 there are no potential boundaries that could create any settlement extension without resulting in physical merger, whereas adjacent to edge RT4 there is an existing boundary feature that could contain a small scale settlement extension without fundamentally undermining the purposes of including land in the green belt. Showing edge RT4 as 'red' (strategic gap) would be inconsistent with assessment elsewhere in the district and fail to recognise the characteristics and role of different parts of the green belt.

Green Belt Edge - RT5

Support 0 Object 1 No Comment 0

DLP_GBR178

RT5 prevents Roberttown merging with Mirfield which is an important green belt role given the loss of site MX1929.

No change. Comment noted.

Green Belt Edge - RT7

Support 0 Object 1 No Comment 0

DLP_GBR179

RT7 along with RT8 should be assessed as being of the utmost importance in regard to checking sprawl, safeguarding the countryside from encroachment and preserving the historic setting and character of Roberttown and should be preserved and strengthened.

No change.
RT7 amber (3) and RT8 amber (4) reflect the differing characteristics of the existing settlement pattern and land use features in the green belt and therefore the different scale of impact settlement extension could have on the role and function of the green belt. The different assessment reflects the fact that the field pattern adjacent to each edge is different and allowing settlement extension adjacent to RT8 could have a greater impact that adjacent to RT7. Assessing both edges as pink (5) would be inconsistent with assessments elsewhere in the district and would fail to recognise the differing characteristics of each part of the green belt.

Green Belt Edge - RT8

Support 0 Object 1 No Comment 0

DLP_GBR180

Summary of comments

RT8 along with RT7 should be assessed as being of the utmost importance in regard to checking sprawl, safeguarding the countryside from encroachment and preserving the historic setting and character of Roberttown and should be preserved and strengthened.

Council Response

No change.
RT7 amber (3) and RT8 amber (4) reflect the differing characteristics of the existing settlement pattern and land use features in the green belt and therefore the different scale of impact settlement extension could have on the role and function of the green belt. The different assessment reflects the fact that the field pattern adjacent to each edge is different and allowing settlement extension adjacent to RT8 could have a greater impact that adjacent to RT7. Assessing both edges as pink (5) would be inconsistent with assessments elsewhere in the district and would fail to recognise the differing characteristics of each part of the green belt.

Green Belt Edge - SC1

Support 0 Object 1 No Comment 0

DLP_GBR138

The existing boundary is undefined by physical features to the north of Hollin Hall Lane and runs through the garden of Jeabar, High Street, Scapegoat Hill and the middle of a farm equipment storage yard. There is a more logical and clearly defined boundary running along the boundary wall to the east of both properties.

Proposed change
New 'remove small site from the green belt' option created (RSSGB118).

Green Belt Edge - SHL11

Support 0 Object 1 No Comment 0

DLP_GBR209

Test 2b of edge SHL11 is incorrectly assessed as 'red' and should be re-assessed as 'green' as development (of site H169) would not lead to unrestricted sprawl. The site is well contained and would present stronger boundaries than the existing rear garden boundaries. Edge SHL11 is therefore incorrectly assessed as (4) and should be assessed as (1) or (2) i.e. 'green'. The site is well contained, does not lead to coalescence, and would not lead to unrestricted sprawl or encroachment.

No change
Paragraph 4.16 of the Green belt Review and Outcomes report states that an area's importance in checking the unrestricted sprawl of large built up areas will in part be judged on the presence of strong physical boundaries or landform which would contain an extension of development into the green belt. The existing green belt edge that delineates the western edge of Shelley is formed by the garden boundaries of properties on Park Avenue. The existing green belt follows a strong, linear edge and there is a very clear distinction between land that is residential and land that is agricultural. It is not accepted that the existing boundary is weak, nor that the adjacent land does not fulfil a strong green belt role in that it prevents the sprawl of Shelley to the west. Edge SHL11 is therefore correctly assessed as 'red' at test 2b and as '4' overall. Assessing the edge as 'green' would be inconsistent with assessment elsewhere in the district and fail to recognise the characteristics of different parts of the settlement edge.

Test 2c of edge SHL11 is incorrectly assessed as 'amber' and should be re-assessed as 'green' as the site is well contained by development, is urban fringe and is not associated with wider countryside. Edge SHL11 is therefore incorrectly assessed as (4) and should be assessed as (1) or (2) i.e. 'green'. The site is well contained, does not lead to coalescence, and would not lead to unrestricted sprawl or encroachment.

No change
It is not accepted that the agricultural land to the west of Shelley is well contained by development, nor that it is an area of urban fringe. While there is some minor frontage development on Penistone Road the area consists entirely of open agricultural land, bounded by trees to the north. There is overlooking from properties on Park Avenue but this does not diminish the area's countryside character. The property at Healey Farm is considered to be sufficiently remote from the urban edge not to influence its appearance as countryside and farm access roads and tracks do not constitute urban fringe features. Landform restricts the relationship of the site to the countryside to the north, but the site is visible in long distance views from the south as open rising land very distinct in character from the strong urban edge of Shelley. Edge SHL11 is therefore correctly assessed as 'amber' at test 2c and as '4' overall. Assessing the edge as 'green' would be inconsistent with assessment elsewhere in the district and fail to recognise the characteristics of different parts of the settlement edge.

Green Belt Review - Assessment matrix

Support 0 Object 1 No Comment 0

DLP_GBR201

The Green Belt Review and Outcomes document provides a site-specific assessment of the current landscape and visual qualities of the Green Belt and its contribution to the existing character of this area where 2 local authorities adjoin one another. The main part of this analysis takes the form of a matrix that examines a series of areas based on what are described as 'separately identifiable lengths' of the Green Belt boundary and the adjoining land related to each length. This matrix analysis appears both extremely limited in terms of any understanding it seeks to offer the general public, but also one void of any overall clarity as a result.

No change
The Green Belt Review assesses the green belt edge and land beyond it. Individual site assessments have been carried out in line with the site assessment methodology and this includes consideration of the impact of the site on the purposes of including land in the green belt, using the Green Belt Review as a guide. The matrix is given for information to show how the overall conclusion and score for each length of edge has been arrived at.

Green Belt Review - p1.2

Support 0 Object 1 No Comment 0

DLP_GBR76

Summary of comments

If indeed the council were to abide by NPPF 2012 there would have been no need for this chapter at all. It states that green belt should only be altered in exceptional circumstances. There are no indications that any of these have arisen.

Council Response

No change.
Paragraph 1.2 of the Green Belt Review states that once established green belt boundaries should only be altered in exceptional circumstances through the preparation or review of the development plan, and this is consistent with national planning policy as set out in the National Planning Policy Framework. Exceptional circumstances for the alteration of a green belt boundary will only exist if the exceptional circumstance necessitates such a change. The Local Plan Strategies and Policies document states at paragraphs 4.5 and 4.6 that the need for housing and employment land in Kirklees over the lifetime of the plan is in excess of the capacity available in non-green belt areas to accommodate it. As such, exceptional circumstances exist that necessitate a change to the green belt boundary where a site is deemed to be required to meet the need for development as part of the Local Plan strategy.

Green Belt Review - p3.1

Support 1 Object 0 No Comment 0

DLP_GBR112

The exercise carried out in terms of evaluation of the sites proposed to be added to the Green Belt is one which appears to have been carried out assiduously and has applied appropriate tests for assessment following the rationale set out in Paragraphs 83 to 86 of the National Planning Policy Framework. The general approach taken in carrying out this exercise is supported

No change
Support noted.

Green Belt Review - p4.20

Support 0 Object 1 No Comment 0

DLP_GBR95

Including the test 'to preserve the setting of historic assets' in the green belt review is inconsistent with national policy and therefore should not be afforded any weight. While test 2d purports to reflect the green belt purpose of preserving the setting of historic towns, the Kirklees test is applied to sites that contain historic assets. This is relevant to test 1, but as a separate test is inconsistent with NPPF.

No change
Paragraph 4.20 of the Green Belt Review states that one of the purposes of the green belt is to 'preserve the setting and special character of historic towns'. The paragraph acknowledges that there are no such historic towns in Kirklees, but states that the district does contain a significant number of historic features and where relevant these have been noted in test 2d, scoring either 'green' or 'amber'. In only two areas of the district has the score been 'red' indicating that the presence of an historic asset has been afforded significant weight. These are the area associated with the Adwalton Moor historic battlefield at Birkenshaw and Castle Hill in Huddersfield, a scheduled ancient monument. Both these assessments followed comment from Historic England.

Green Belt Review - Whole review

Support 2 Object 13 No Comment 1

DLP_GBR12, DLP_GBR27, DLP_GBR109, DLP_GBR120, DLP_GBR169, DLP_GBR196, DLP_GBR204, DLP_GBR205, DLP_GBR206, DLP_GBR207, DLP_GBR208, DLP_GBR213, DLP_GBR214, DLP_GBR217, DLP_GBR242, DLP_GBR243

The methodology adopted and the approach to assessing the Green Belt edge as a means to identify suitable sections of Green Belt which require protection or could accommodate the expansion of a settlement is supported. This approach and methodology is preferred over alternatives; particularly any attempt to consider and assess wider areas/zones within the Green Belt and the identification of Resultant Land Parcels. Experience indicates that such alternatives, whilst looking at the full extent of the Green Belt, are not suitable or sufficiently refined as a detailed and localized assessment which is more appropriate when assessing potential settlement expansion options. The approach and methodology adequately meets the requirements of the NPPF in terms of assessing the five principle functions of the Green Belt. The approach taken by the Council to review its Green Belt boundaries is sound and is supported.

No change
Support noted

The West Yorkshire Archaeology Advisory Service strongly welcomes the recognition of protecting the setting of all the listed buildings & conservation areas that have been mentioned as being protected by the green belt in the review that Kirklees have carried out.

No change
Support noted

The approach to the assessment of small sites is unlawful. It is based on the belief that it is appropriate to ask whether boundaries were incorrectly drawn. This is not an exceptional reason to amended green belt boundaries.

Proposed change
The manner in which small sites were assessed as part of the exercise to digitise the green belt boundary did not rely solely on a consideration of whether the green belt boundary was incorrectly drawn in the Unitary Development Plan. It is accepted that a planning judgement that a boundary may be better placed elsewhere is not sufficient reason to amend the boundary, as although desirable, it is not necessary. If it is not necessary, then exceptional circumstances will not exist to warrant such a change. The 'accepted' small sites in the Green Belt Review will be reconsidered to ensure that exceptional circumstances exist to warrant a change to the boundary. Any changes resulting from this exercise will form part of the revised Green Belt Review and Outcomes report.

Summary of comments

Statements made in the Green Belt Review document are at odds with the proposals for development within Green Belt. The Green Belt Strategy states that only areas of less than 0.4ha would be considered as part of the exercise to digitise the boundary. This is at odds for example with proposals at Lepton for 3 sites within green belt all between 4ha and 6ha, as well as with test 2c, 'safeguarding the countryside from encroachment'.

The greenbelt review does not state anywhere that the Chidswell area is the last area of open countryside separating major conurbations of Leeds, Wakefield and Kirklees. This is a fundamental point. If breaking up this area into smaller sections means it is not possible to make the current nature of the role of the area of greenbelt clear then the methodology is flawed.

The Green Belt Review does not thoroughly consider the role and purpose of the Green Belt in all areas throughout the district, therefore there is no up to date Green Belt Review which has set out a rigorous and robust methodology.

Drighlington has not been assessed as part of the Green Belt Review and this is a fundamental error in the process. Other boundaries with adjoining local authority areas have been assessed (e.g. BS11 and B/EB1) so there is no justification for not considering the boundary with Drighlington.

The Green Belt Review is unsound and would not result in a plan which is positively prepared. The correct interpretation of national policy is a matter for the law and the tests for defining exceptional circumstances is a single composite test. The circumstances are not exceptional unless they necessitate a revision of the green belt boundary. The process of preparing a local plan is not itself regarded as exceptional circumstances. Something must have occurred subsequent to the definition that justifies a change and the only exception to this is where there is a clear error in the first place that should be corrected. The Council's position that meeting OAN for housing or employment is not sufficient on its own to pass the exceptional circumstances test is misplaced. If there was not a development need to meet, it is difficult to see what other exceptional circumstances would warrant a review of the green belt in the light of case law. A review that simply looks at changed opinions about boundaries remaining appropriate is not likely to amount to exceptional circumstances. The Council should clearly define what the exceptional circumstances are.

There is no justification for the three tests set out in the methodology, nor for the 'gateway' approach, in any of the national or legal requirements. Test 2a is a 'gateway' test and the green belt is only considered further if land passes this test. This is inconsistent with NPPF which states that the fundamental purpose of green belt is to prevent urban sprawl.

The need to clarify the demarcation lines is appreciated BUT why have gardens and buildings been allowed to develop on Green Belt land.

Test 1 is reasonable, in that if the principal exceptional circumstance relies on the delivery of needed development, it follows that land should not be removed if it has real constraints that inhibit development.

Council Response

No change

Paragraph 2.7 of the Green Belt Review and Outcomes report explains the procedure that has been followed when requests to remove land from the green belt have been received and clearly differentiates between sites above and below 0.4ha in size. Where the area of land is 0.4ha or larger the site has been created as a site option and considered through the Local Plan site options procedure. Requests concerning land of less than 0.4ha in size have been considered as part of the exercise to digitise the green belt boundary and advertised as a change only where such a change is deemed to be warranted. The degree to which site options would conflict with the purposes of including land in the green belt, including the degree to which development would encroach into the countryside, has been considered as part of the green belt assessment of development sites.

No change

The Kirklees Green Belt Review assessed the green belt edge and land beyond it for its green belt role. The differently 'coloured' edges help to illustrate the strategic role each area of green belt plays, from the extensive areas where new development could be accommodated without undermining green belt purposes to the areas assessed as 'strategic gaps' where any development could significantly undermine the role and function of the green belt. As part of the site assessment methodology, each proposed development site was assessed for the impact removing the site would have on the role and function of the green belt. This assessment consisted of two parts; an edge assessment and an overall site assessment. The edge assessment considers the location of the site relative to the strategic role the green belt adjacent to the edge plays, consistent with the assessment of each section of edge.

No change

The Kirklees/Leeds administrative boundary runs along the edge of the A650, meaning that Drighlington as a settlement is within Leeds. The Kirklees green belt boundary abuts the road, which is in Leeds, so any development in this location would be wholly unrelated to any settlement in Kirklees. For comparison, edge ref BS11 delineates the boundary of the built up area of the West Yorkshire Retail Park, but the road it abuts, (the M62), is within Kirklees. Edge BS11 has also been assessed as 'black constrained', in that it is not physically possible to extend the settlement into the motorway. B/EB1 assesses the green belt edge where it meets properties at Toftshaw, Bradford. However, the properties on the south side of Toftshaw Lane are within the Kirklees administrative district. In this case, it would be possible to extend the settlement into Kirklees if necessary.

No change

The Council considers that the approach to the Green Belt Review is both justified and consistent with national planning policy. The Green Belt Review is a supporting document which aids site specific green belt assessments. These form one part of the overall technical site assessments which have resulted in the allocation of sites to meet the objectively assessed need for housing and employment land, consistent with the spatial development strategy. Whether exceptional circumstances exist to remove a site from the green belt will be published as part of the Publication draft Local Plan, along with the green belt assessment of each site. The Green Belt Review as presented did not simply look at changed opinions about boundaries remaining appropriate. The exercise to digitise the green belt boundary was necessary in order to create an 'electronic' boundary for the purposes of the Local Plan. Part of this exercise was to make necessary minor adjustments, for example where the exact position was no longer clear, and to assess small sites submitted that requested a change to the position of the boundary. Only in those cases where something had occurred subsequent to the original definition of the boundary that warranted such a change were accepted, and the reasons for doing so clearly set out.

No change

As the purpose of the Green Belt Review was to support the assessment of development options it is reasonable to apply a 'gateway' if land is deemed to be severely constrained, and also if land is deemed to constitute a strategic gap where any further land release would significantly undermine the role and function of the green belt.

No change

The green belt in Kirklees is very extensive and includes within it many existing houses and their gardens. In addition, national planning guidance states that some development can be appropriate in the green belt.

No change

The support for the principle of test 1 is noted. While it is acknowledged that it may be possible to engineer

Summary of comments

However, there is insufficient clarity of the evidence base used to underpin the topographical, physical or environmental tests. Slope, for example, could be mitigated by engineering solutions and the presence of a listed building would not necessarily render a site undevelopable.

If the Green Belt Review is fundamentally flawed, this would indicate that the distribution strategy proposed by the Council (for which there is no apparent explanation) in conjunction with the proposed site allocations are also flawed and unsound. The review does not contain any assessment of any of the site's abilities to meet the terms of paragraphs 84 (promote sustainable patterns of development) and 85 (ensure consistency with the plan's strategy). These are factors relevant to the choices about where development should be accommodated.

Test 3 cannot be applied sensibly to brownfield land that is in the green belt as the point of the green belt is the purpose it serves; assisting urban regeneration by creating pressure to develop in the non-green belt areas, not the purpose it may inhibit; which is the redevelopment of brownfield land in the green belt. Brownfield sites should be assessed along with all other green belt land, not through an additional test.

Although the Review suggests that the intention is simply to "tidy up" and modernize Green Belt boundaries, in effect what is being promoted is a removal of Green Belt land to allow development and a radical shift in the nature and experience of Kirklees as a place to live to the benefit of developers' profits.

There is no explanation of the weighting process. The approach to tests 2a and 2b is confusing as the review confirms that sprawl is a matter of particular emphasis in the NPPF and therefore weighted more heavily yet merger, not sprawl, precludes further consideration of the site.

The Kirklees Green Belt Review methodology places more weight on coalescence and if the outcome of this test is severe then the other purposes are not considered. The NPPF does not state that any of the purposes of the green belt hold more weight in relation to the function of the green belt.

A three stage approach to the Green Belt Review should have been undertaken, including 1) identification of general areas; 2) technical site assessment and 3) re-appraisal of resultant land parcels. Such an approach has been undertaken elsewhere and is rigorous and transparent.

Council Response

solutions to development on severe slopes, alternative sites without such a degree of constraint would be more likely to result in deliverable development options. Severe slopes also represent a high risk of prominent and intrusive development to the detriment of openness and to local character. The individual assessment of each site has considered whether it would make a suitable new allocation taking all factors, including topography and the presence of listed buildings and conservation areas, into consideration.

No change

The Green Belt Review and Outcomes report provides an assessment to inform the choice of new development options and is a guide to determine what impact the removal of land would have on the role and function of the green belt. Choices about where development should be accommodated are made as part of the preparation of the Local Plan as a whole, consistent with the spatial development strategy.

No change

Paragraph 4.24 of the Green Belt Review and Outcomes report states that it is possible to interpret the purpose of green belt in assisting urban regeneration by encouraging the recycling of derelict and other urban land, both at a strategic level and at a local level. The strategic interpretation is that the presence of green belt directs development pressure towards urban areas. The Kirklees Green Belt Review also considers whether the presence of green belt may be constraining the re-use of land considered to have an urban land use, and therefore whether it is correctly located within the green belt. All brownfield sites were assessed through the site selection methodology. Test 3 was an additional assessment looking solely at brownfield land on the edge of the built up area to determine whether the green belt was preventing its beneficial re-use.

No change.

The role of the Kirklees Green Belt Review is to interpret the correct position of the UDP green belt boundary for the purpose of digitising the boundary for the Local Plan, to assess small sites that were not development options, and to carry out the green belt edge review, which assessed land adjacent to the settlement edge for its contribution to green belt purposes. Any decision to remove land from the green belt in order to meet the requirement for housing and employment land is taken through the process of preparing the Local Plan as a whole and requires exceptional circumstances. Should green belt land be required to meet those needs the Green Belt Review is an aid to the assessment of the most appropriate locations for green belt release.

No change

No weighting of green belt purposes is intended in the Green Belt Review by the application of the tests in the order presented. Merger can be deemed to preclude further analysis of the role and function of the green belt because by being considered to be a strategic gap, any land release could fundamentally undermine the role and function of the green belt and this is a clear aid to the assessment of development options. Whether or not land would prevent sprawl, or safeguards the countryside from encroachment is a judgement about the overall role and function of the green belt in those areas where it is deemed that it may still be possible to find development sites that would not fundamentally undermine that role, or where the harm to the role and purpose of the green belt could be minimised. To reflect the fundamental purpose of the green belt in preventing sprawl, the assessment matrix at Appendix 3 shows that land deemed to be the most important in terms of green belt role and function is land that is important in checking the unrestricted sprawl of built up areas. This weighting in the matrix is explained in paragraph 4.21 of the draft Local Plan Green Belt Review and Outcomes report.

No change

Test 2a of the Kirklees Green Belt Review methodology considered whether any particular area of green belt constituted a strategic gap, where any green belt release could risk coalescence and therefore fundamentally undermine its green belt role and function. Where this was considered to be the case, the other purposes of including land in the green belt were not considered as part of the review methodology. However, all sites were assessed individually for their green belt role consistent with the site assessment methodology.

No change

National planning policy and guidance does not contain any preferred methodology for carrying out a green belt review. The methodology adopted by the Council reviewed the entirety of the edge, where the green belt abuts the built up area and this approach is entirely consistent with, and supports, the sequential approach to development options. In addition, every green belt site underwent a full assessment for its role in meeting green belt purposes.

Summary of comments

A green belt review should not begin by considering how robust current boundaries are, nor should a review methodology consider whether physical changes to boundaries over time might amount to the exceptional circumstances required to move them and this is supported in case law .

Council Response

No change
 One part of the Green Belt Review was to create a digitised green belt boundary. This is required as the current statutory green belt boundary shown on the Unitary Development Plan at a scale of 1:10,000 is inadequate for the purposes of the Local Plan and has in the past led to difficulties of interpretation. This exercise is largely one to interpret and capture the correct position of the green belt boundary on the current OS map (master-map). It is not an exercise to review whether the boundary, in its entirety, is correctly located. Only in those cases where the boundary clearly and definitely is no longer defensible or discernible is the boundary proposed to be adjusted, and these have been advertised as minor changes. Retaining a green belt boundary that has become wholly unsuitable for the purposes of interpreting green belt policy would lead to difficulties of interpretation and remove certainty.

Housing site - H159

Support 1 Object 0 No Comment 0

DLP_RSO980, DLP_RSO1243, DLP_RSO1313

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

Housing site - H2739

Support 0 Object 0 No Comment 1

DLP_GBR157

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

Housing site - H316

Support 0 Object 1 No Comment 0

DLP_RSO790, DLP_RSO996, DLP_RSO1241, DLP_RSO4965

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

Housing site - H347

Support 0 Object 1 No Comment 0

DLP_GBR231

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

Housing site - H719

Support 0 Object 1 No Comment 0

DLP_RSO789, DLP_RSO981, DLP_RSO1242

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

Housing site - H97

Support 0 Object 0 No Comment 1

DLP_RSO3065

The summary of the representation(s) is available in the Allocations and Designations Consultation report

The response to the representation(s) received is available in the Allocations and Designations Consultation report

Summary of comments	Council Response
The summary of the representation(s) is available in the Allocations and Designations Consultation report	The response to the representation(s) received is available in the Allocations and Designations Consultation report
Remove from Green Belt - RGB2081	Support 0 Object 1 No Comment 0
DLP_GBR117	
The summary of the representation(s) is available in the Allocations and Designations Consultation report	The response to the representation(s) received is available in the Allocations and Designations Consultation report
Remove from Green Belt - RGB2611	Support 0 Object 1 No Comment 0
DLP_GBR210	
The summary of the representation(s) is available in the Allocations and Designations Consultation report	The response to the representation(s) received is available in the Allocations and Designations Consultation report
Remove from Green Belt - RGB2613	Support 0 Object 1 No Comment 0
DLP_GBR212	
The summary of the representation(s) is available in the Allocations and Designations Consultation report	The response to the representation(s) received is available in the Allocations and Designations Consultation report
Remove from Green Belt - RGB2702	Support 0 Object 1 No Comment 0
DLP_GBR32	
The summary of the representation(s) is available in the Allocations and Designations Consultation report	The response to the representation(s) received is available in the Allocations and Designations Consultation report
Remove small site from GB - RSSGB21	Support 0 Object 1 No Comment 0
DLP_GBR165	
This is a brownfield site that is available for development. Development would have the added benefit of improving the junction of Chandler Lane with Meltham Road.	No change. This site is detached from the settlement edge (isolated) in that it has no boundary with Honley. It cannot therefore be released from the green belt without also requiring the release of additional land in order to give the site a relationship with the settlement. It is acknowledged that the site does sit in close proximity to the settlement edge, but would breach the existing strong boundary formed by Meltham Road and would result in a poorly related block of built form in the otherwise open agricultural land north of Meltham Road. Although the site may in part be brownfield it contains no buildings of any bulk or mass so new residential development would detrimentally impact on openness. Any potential improvement to the road junction does not outweigh the harm caused by releasing the site from the green belt. Removing the site from the green belt would create a small pocket of non-green belt land surrounded by green belt, which is contrary to the purposes of including land in the green belt.
Remove small site from GB - RSSGB28	Support 0 Object 8 No Comment 0
DLP_GBR39, DLP_GBR41, DLP_GBR43, DLP_GBR44, DLP_GBR63, DLP_GBR68, DLP_GBR71, DLP_GBR75	
The fact that this option abuts another rejected option is irrelevant.	No change This is not a reason for rejection but is given solely for information. This is so that the relationship between abutting sites can be assessed if necessary and also so that this site could be reconsidered should the decision on the adjoining option be reversed.
This site serves no green belt purpose. The site was cut out of the hillside in order to accommodate three dwellings. There is evidence of the houses that used to occupy this site as there are still the remains of floors and walls and it is therefore brownfield. Development would help meet housing need. The land is neither useful nor attractive, has been used for dumping rubbish, is an eyesore and development would improve the appearance of the area. It is preferable to use this brownfield site rather than land that has other value, such as gardens.	No change. This site is detached from the settlement edge (isolated) in that it has no boundary with the unallocated settlement. It cannot therefore be released from the green belt without also requiring the release of additional land in order to give the site a relationship with the settlement. While the site has previously been developed with housing these remains have now blended into the landscape to the extent that the site is not considered to be brownfield. The site appears as part of the undeveloped edge to Thornhill and therefore helps to maintain the openness of the steep hillside of which it is a part. Land being unsightly is not a reason to release it from the green belt.

Summary of comments	Council Response					
<p>Remove small site from GB - RSSGB64</p> <p>DLP_GBR50</p> <p>The site should not have been rejected for removal from the green belt on the grounds that there is no physical feature on the ground for the green belt boundary to follow thereby leaving adjacent land vulnerable to encroachment. The site does not perform any green belt role. The site is bounded by a hedge and there is a section of existing green belt boundary which does not follow a feature on the ground and which has therefore set the precedent for allowing the boundary to not follow any physical feature.</p>	Support	0	Object	1	No Comment	0
<p>Remove small site from GB - RSSGB65</p> <p>DLP_GBR86</p> <p>This site will provide land for affordable housing for which there is a need in the area. Access is available and would have the added benefit of allowing access to site H671. The site does not contain any habitat of high ecological value.</p>	Support	0	Object	1	No Comment	0
<p>Remove small site from GB - RSSGB7</p> <p>DLP_GBR241</p> <p>This site is infill as it has housing to 3 sides and road frontage to the other side. This site would be made available for affordable housing which can be a condition of acceptance. It could also be a condition of planning permission. The site has no constraints so building costs are low. Kirklees have proposed far larger green belt sites for development which will be more harmful to the area than this small site. The small size of the site (0.28 ha) should not preclude it from being usable.</p>	Support	0	Object	1	No Comment	0
<p>Remove small site from GB - RSSGB98</p> <p>DLP_GBR216</p> <p>The site comprises a small paddock and is clearly different in character to the open and rolling countryside to the north and west of Latham Lane. The reason given for the rejection of the site, that its removal would necessitate consideration of the removal of further land, is not justified.</p>	Support	0	Object	1	No Comment	0

No change
It is now agreed that the proposed new boundary would in this location follow a landline, albeit the feature it is following is not strong on the ground. It is also agreed that the existing boundary to the west no longer follows a physical feature. However, this land is not required to meet the objectively assessed need for new housing land, a change to the boundary is not necessary and therefore no exceptional circumstances exist that would warrant a change to the boundary in this location.

No change.
The configuration of this site relative to the settlement edge would result in a poorly related projection of built form into the countryside contrary to the purposes of including land in the green belt, one of which is to safeguard the countryside from encroachment. H671 is itself a rejected option and has no relationship with this site.

No change.
This site is remote from the edge of any non-green belt settlement and cannot therefore be released from the green belt in isolation, as this would create a small pocket of non-green belt land surrounded by green belt which is contrary to the purposes of including land in the green belt. The site size threshold for allocations in the Draft Local Plan is 0.4ha and this site falls below this threshold. This means that it cannot be allocated for development and therefore exceptional circumstances do not exist to release this site from the green belt.

No change
The area of RSSGB98 consists of a paddock of 0.35ha in size. It is located between residential property to the south, which is in the settlement, and 94 Latham Lane to the north, which is in the green belt. The paddock therefore represents a clear open edge to the settlement. Removal of the site from the green belt would bring the green belt boundary up to the garden boundary of no 94, which is clearly domestic in character, resulting in a green belt boundary where the differentiation between land that is open and land that is domestic is not clear. As national policy states that the green belt should not include land that it is unnecessary to keep permanently open, it would be necessary to consider whether no 94 should remain in the green belt if the adjoining paddock were removed from it. RSSGB98 does not follow any feature on the ground for part of its northern edge, which could result in pressure for further encroaching development east of no. 94 between the house and the field boundary. This is clearly contrary to the purposes of including land in the green belt. Green belt sites of less than 0.4ha that abut the settlement edge were considered through the Green Belt Review as part of the exercise to digitise the boundary. Paragraph 2.8 of the Green Belt Review and Outcomes report states that sites were scrutinised to determine whether the change proposed would harm the purposes of including land in the green belt. It is considered that the removal of site RSSGB98 from the green belt would harm green belt purposes by creating a unclear boundary between the green belt and the settlement resulting in pressure for further encroachment. Exceptional circumstances do not exist to remove the area of RSSGB98 from the green belt.