

COMMENTS REGARDING “EXCEPTIONAL CIRCUMSTANCES FOR GREEN BELT  
CHANGE – PAPERS PSF020 AND PSF067”

1. In response to the requests for greater clarity regarding the exceptional circumstances for green belt change, the council has produced the two papers above, the latter containing the same detailed text, but with an added paragraph at the end providing a summary of the case being presented.
2. In paragraph 2.1 of both papers, reference is made to the NPPF statement that “local plans should meet their objectively assessed housing needs in full as far as is consistent with the policies set out in the framework”. Bullet points (a-c) of the same paragraph illustrate the council’s belief that, effectively, there are no questions of framework inconsistency with its proposals for around 11,000 new homes to be derived from green belt deletions.
3. There is, however, scant evidence to support such a conclusion. For instance,
  - There is no indication of what the tipping point would be for the volume of green belt deletions to become untenable in terms of consistency with NPPF policies – eg is it 12,000, 13,000,.....?
  - There is no analysis of green belt sites which shows those that could be classified as the least attractive and of the lowest amenity value versus those sites which best serve the NPPF’s five main purposes of the green belt.
4. Instead, the need for evidence is simply discharged by stating the 11,000 green belt deletions will be in “sustainable locations” and could be released “without significantly undermining the functioning of the green belt at a local and strategic level”. However, citing the Ilkley example
  - How sustainable is it when, as now, a high percentage of the employed occupiers of the new homes would need to routinely commute 15-20 miles each way to Leeds, Bradford and other centres of employment?
  - How can it be said, when the vast majority of Ilkley’s new homes and employment land will be through green belt deletions, that this would not significantly undermine the functioning of the green belt at a local level. Indeed, on this subject, the council’s Growth Study for Ilkley reports that “the green belt performs well with regard to the purposes set out in the NPPF” and that “locally the green belt has a significant role in restricting the sprawl of Ilkley to the east and west along the A65 corridor and the Wharfedale valley floor”?
5. In paragraph 2.2 of both papers, the council intimates that at least a passing consideration has been given to reducing the level of green belt deletions, but then warns that if economic and jobs growth outstrips housing provision “the benefits that may or may not accrue from slightly smaller green belt change would be outweighed by increased levels of commuting” this impacting on “the council’s goals to reduce greenhouse gas emissions, reduce or manage congestion, improve air quality”. There is, however, no evidence to support such an assertion, indeed for Ilkley

and Wharfedale as a whole (see paragraph 4, first bullet point above) the effects of a lower level of green belt deletions would, intuitively, be the exact opposite of what the council is suggesting.

6. In paragraph 2.5 the council stresses that “the numerical estimate (11,000 homes from green belt) does not form a policy within the plan” and that it “will seek to minimise, as far as possible, green belt release when it prepares the detailed site allocating components of the local plan”.

However,

- How effective would such attempts at minimisation be when the settlement housing targets will have been fixed and we already know the only way to accommodate such a commitment is through the use of a large proportion of high amenity value green belt?
  - How effective too would such sentiments be in a potential future scenario when the council is not meeting its very challenging 5-year housing supply plus 20% target and developers focus even more on lucrative Wharfedale green belt options to fill the void?
7. The second part of the papers deal with employment need and in paragraph 3.18 there is further emphasis of the above issues by the statement “the topographical limitations for further development mean that the allocation of good employment sites that will attract inward business investment (in Wharfedale) can only be found within green belt locations”.
  8. Overall, therefore, I do not believe the exceptional case for the scale of green belt deletions has been made, especially when weighed against the many clear policy intentions and the stated green belt protections set out in the House of Commons note on green belt – paper PSF045.
  9. There is an alternative of course. A significantly lower overall housing target for the District would allow a better fit with NPPF policies and, at the same time, help lessen the potential for a shortfall in the 5-year housing supply and yet further pressures on green belt sites down the line.

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