

## Core Strategy Development Plan Document Proposed Main Modifications – November 2015 Representation Form

| For Office Use only: |  |
|----------------------|--|
| Date                 |  |
| Ref                  |  |

**PART B – YOUR REPRESENTATION - Please use a separate sheet for each representation.**  
(Additional Part B forms can be downloaded from the web page)

### 4. To which proposed main modification does this representation relate?

Proposed Main Modification number:

MM18

### 5. Do support or object the proposed main modification?

Support

Object

X

### 6. Do you consider the proposed main modification to be 'legally compliant'?

Yes

No

### 7. Do you consider the proposed main modification to be 'sound'?

Yes

No – 'unsound'

X

### 8. If you consider the proposed main modification to be 'unsound', please identify which test of soundness your comments relate to?

Positively prepared

Justified

X

Effective

Consistent with National Planning Policy (the NPPF)

X

### 9. Please give details of why you consider the proposed main modification is not legally compliant or is unsound in light of the main modifications proposed. Please be as precise as possible.

If you wish to support the proposed main modification please use this box to set out your comments.

(Please note: Your representation should cover succinctly all the information, evidence and supporting information necessary to support / justify the representation and the suggested change. It is important that your representation relates to a proposed main modification).

MM18 proposes and attempts to justify the release of 135 hectares of Green Belt land to meet the Core Strategy's target of 42,100 homes for the plan period and beyond. ACS in its comments on MM72 questions the whole basis and methodology in reaching a housing target of 42,100. Paragraph 79 of the NPPF states "the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, the essential characteristics of Green Belts are their openness and their permanence". Paragraph 80 lists 5 purposes for Green Belt including "to prevent neighbouring towns merging into one another and to assist in safeguarding the countryside from encroachment". Green Belt policy was reaffirmed by Nick Boles the then Parliamentary Under Secretary for Planning who issued a written ministerial statement in March 2015 and wrote: "I would particularly note that we are: Re-affirming Green Belt protection, noting that unmet housing need is

unlikely to outweigh harm to the Green Belt and other harm to constitute very special circumstances justifying inappropriate development”.

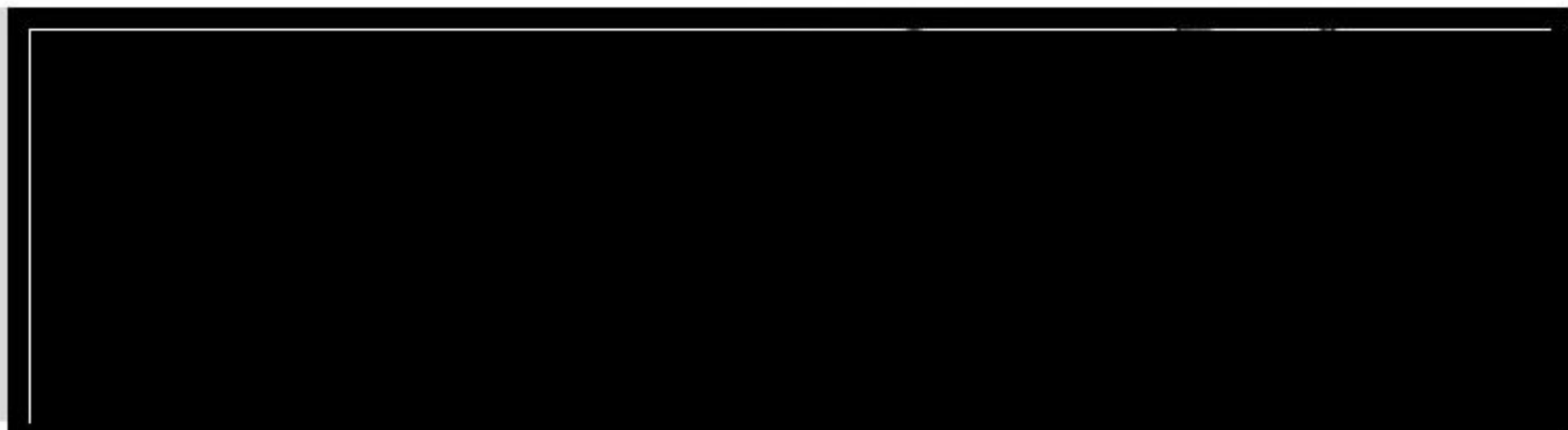
ACS therefore believes that the Council do not have a valid case for taking 135 hectares of land out of Green Belt based on the spurious need to provide 42,100 homes. It is also likely that much of this land will be ruled out when the Environment Agency reviews its flood risk strategy for river catchments (see also comments on MM127 by ACS and other Wharfedale groups). MM18 is therefore unsound and contravenes the NPPF Green Belt provisions.

**10. Please set out what changes you consider necessary to make the proposed main modifications legally compliant or sound, having regard to the test you have identified at Q7 above.**

**You need to say why this change will make the proposed main modification legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Re-evaluation of Green Belt land needs to be put on hold pending recalculation of housing needs based on plausible input data and after the Environment Agency has reconsidered its river catchment flood risk strategy. Even then Green Belt release should be seen as a last resort and not a “profitable quick fix” for developers to meet the housing target.

**11.  
Signature:**



**Date:**

19<sup>th</sup> January 20106

**Thank you for taking the time to complete this Representation Form.**