

## **Kirklees Local Plan Examination**

### **Stage 4 hearings Other Site Allocations**

#### **KIRKLEES RURAL SUB-AREA (Matter 43)**

#### **MATTERS, ISSUES AND QUESTIONS (MIQs)**

##### **Council Response**

##### **Matter 43 – Holme Valley North allocations**

- 1.1 This statement sets out the council's responses in relation to the Inspector's matters and issues Matter 43. All the documents referred to in this statement are referenced within the main body of the statement.
- 1.2 The modifications proposed in this document have been provided to assist with the discussions at the hearings for this matter and have not been subject to sustainability appraisal testing or public consultation. Should it be necessary to make any of the modifications these will be added to the full schedule of modifications to the Local Plan which will be made available for comment and subject to sustainability appraisal at a later stage of the Examination in Public, subject to the delegated powers agreed by the council's Cabinet.
- 1.3 The following table (table 1) sets out the response to each question against the site reference.

**Issue – Are the proposed employment, housing and safeguarded land allocations in Holme Valley North justified, effective, developable/deliverable and in line with national policy?**

Table 1: Matter 43 – Holme Valley North allocations

<u>Honley</u>	a) Is the site suitable for the proposed use? In the case of employment and housing allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?	c) Is the site available and deliverable in the timescales envisaged?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
E1900 – land west of Honley Business Centre, New Mill Road (7,700 m2)	<p>This site is proposed as an accepted employment allocation and has been assessed in accordance with Local Plan Methodology Part 2: Site allocation methodology (BP23). It is an existing UDP Business and Industry allocation, located within an existing locally significant area of business and industry, sandwiched between an existing industrial estate and the River Holme.</p> <p>The plan provides clear guidance on the requirements and constraints on pages 17 and 18 of the Allocations and Designations document (SD2). None of these are considered as significant and all could be addressed as part of a detailed planning</p>	<p>An indicative capacity is provided (7,700 sq. m); this capacity is based on a net site area taking into account a non-developable area (BAP Priory Habitat).</p> <p>The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber ‘Translating Jobs into Land’ study by Roger Tym &amp; Partners, April 2010 (CR25). The recommended plot ratios</p>	<p>This site is an existing UDP Business and Industry allocation; it has been assessed in the Kirklees Employment Market Strength Assessment (LE11) as being likely to be attractive to market, albeit an undeveloped UDP allocation. It has no significant development constraints and it is likely to be economically viable in the medium to short term. There is a reasonable prospect that this site will become available during the plan</p>	N/A

	<p>application. The reports that maybe required to accompany the submission of a planning application have also been listed. Mitigation measures are also specified, the proximity of the site to residential properties has been taken into account and appropriate mitigation will be considered.</p> <p>The whole of the site lies within Flood Zone 3, therefore a flood risk sequential test, site-specific Flood Risk Assessment and appropriate mitigation would be required. The Flood Risk Technical Paper (BP24) sets out the Local Plan sequential test.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p><b>Proposed modification in the reports required:</b></p> <p><b>Replace Transport Statement with Transport Assessment</b></p>	<p>of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.</p> <p>The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.</p>	<p>period. As such this site is considered as deliverable during the plan period.</p>	
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**E1900 – land west of Honley Business Centre, New Mill Road**

i) Does the proposal provide sufficient mitigation measures in relation to the protection and enhancement of biodiversity?

The proposal provides sufficient mitigation measures in relation to the protection and enhancement of biodiversity. The River Holme runs on the west side of this site, this is a UK BAP Priority Habitat. To protect this Priority Habitat, a 10m buffer from the river has been removed from the developable area to ensure that disturbance to wildlife is low including from light pollution over the water. Enhancements to biodiversity will be considered through the planning application process, including invasive species control, wetland and woodland habitat creation. Policy PLP 30 would be applied to ensure appropriate levels of protection is afforded to the biodiversity assets.

<p>H48 – Travel Station Yard, Station Road (14 dwellings) (Green Belt release)</p>	<p>This site has been assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The Local Plan site box is clear about the potential constraints and there is a reasonable prospect that the constraints identified can be overcome to allow delivery of housing on this site. These include a noise source (the adjacent railway line) which would require mitigation through design, SSSI (on the other side of the railway line), more detailed assessment of surface water drainage and an assessment of potential contamination. The development of this site would be considered in the context of the drainage requirements of Policy PLP28 (SD1).</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Design &amp; Access statement provided with a planning application will inform and direct the</p>	<p>There is no indication that the site constraints identified would result in a lower capacity on this site. The indicative site capacity is therefore appropriate in accordance with the approach set out in EX30.2.</p>	<p>The site is available as identified through the Call for Sites process.</p> <p>As this site is in the green belt and the site is deliverable, it is scheduled to start in 2020/21 which is achievable in accordance with the phasing approach in EX30.2.</p>	<p>This is a brownfield site in the green belt.</p> <p>The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing</p>
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	nature and scale of any mitigation measures required.			development on the site outweigh the loss of this part of the green belt.
H178 – land south of Southwood Avenue (23 dwellings) (Green Belt release)	<p>This site has been assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The site box is clear about the potential constraints including the potential requirement for third party land to achieve sufficient visibility splays and the potential for surface water drainage options to cross third party land. The relevant reports required are also set out in the site box. A drainage solution can be achieved using existing infrastructure on Southwood Avenue and/or Yorkshire Water powers of requisition to access such infrastructure.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>	There is no indication that the site constraints identified would result in a lower capacity on this site so the indicative site capacity is appropriate based on the standard approach set out in EX30.2.	<p>The site is available as identified through the Call for Sites process.</p> <p>Part of the site including the access is within the green belt. Taking into account the willing landowner the phasing of this site to start delivery in 2020/21 is appropriate in accordance with the approach set out for the phasing of sites currently in the green belt in EX30.2.</p>	<p>Approximately half of this site is within the green belt with the remainder currently unallocated in the Kirklees UDP.</p> <p>The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.</p>

**H178 – land south of Southwood Avenue, Honley**

i) Is there a need for mitigation measures to create a more defensible site boundary in the vicinity of Southwood Avenue?

The council believe the current site boundary for H178 to be the most defensible site boundary. There is a small part of the accepted H178 site boundary which does not follow any feature on the ground (between the southern-western corner of the curtilage of 16 Southwood Avenue and the existing track). Although there are no landline features for this part of the boundary it is clear the H178 boundary continues to follow the line of the western boundary of 16 Southwood Avenue until the line reaches the access track.

Alternative options to this approach could have included amending the site boundary to follow the landline provided by the existing access track which the council do not believe would be justified as it would result in a small triangle of green belt land between the site and 16 Southwood Avenue. A further option was to add further land to the site to the west but this would not form a defensible boundary due to a lack of landlines/features on the ground. Housing options H1765 and H822 extended into this area and were both rejected to due to the sprawl of built form down a prominent hillside which would have an unacceptable impact on the green belt.

<p>H2586 – site of former Thirstin Mills, Thirstin Road (24 dwellings) (Green Belt release)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan site box clearly sets out the constraints and requirements including surface water issues, presence of a culverted watercourse (including some areas of flood risk), the conservation area and the setting of Castle Hill.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>	<p>There is no indication that the site constraints identified would result in a lower capacity on this site as the capacity is based on the extant planning permission. The indicative site capacity is therefore appropriate.</p>	<p>The site is available as shown by the planning application (2016/93243).</p> <p>This site is deliverable and is shown in EX30.2 as delivering dwellings from 2018/19 onwards which is realistic as there was a resolution to approve the application at a recent planning committee and the decision is expected to be issued soon.</p>	<p>A very narrow strip of land along the west of this site is currently in the green belt but the remainder of this site is unallocated in the Unitary Development Plan. The existing green belt boundary was drawn along the rear walls of the mill buildings which are no longer present. The site boundary now follows the retaining wall which was built as part of the implementation of a previous planning permission which became a stalled site.</p> <p>The full green belt assessment for this site is</p>
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	<p>The site has an extant planning permission (2011/92197) for 24 dwellings which has been started and could be fully implemented and as such the constraints to delivery have been overcome.</p> <p>A revised planning application has been submitted (2016/93243). There was a resolution to approve the application at the Huddersfield planning sub-committee on 12/10/17 but the decision notice has not yet been issued.</p>			<p>set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.</p>
<p>H584 – land south of Gynn Lane (50 dwellings) (Green Belt release)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The site box clearly sets out the constraints including the impact on protected trees which would require mitigation, surface water issues and the proximity to listed buildings. The consideration of the listed building has been set out in the response to question (i) below.</p>	<p>The indicative capacity of this site is appropriate as the protected trees and existing dwelling within the site have been removed from the developable area. The indicative capacity has been calculated for the developable area which is appropriate based on the approach set out in</p>	<p>The site is available as identified through the Call for Sites process.</p> <p>The delivery of homes is phased from 2020/21. This is appropriate as there is a willing landowner and the phasing reflects the current green belt policy constraint on this site in</p>	<p>The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need</p>

	<p>The site box states that substantial mitigation measures will be required due to the loss of protected trees along part of the site frontage. An Arboricultural Survey is required which will need to include such mitigation measures. The consideration of the impact on listed buildings is considered below.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required. The development of this site would be considered in accordance with the surface water drainage requirements of Policy PLP28 (SD1).</p>	EX30.2.	accordance with the approach set out in EX30.2.	for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt
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**H584 – land south of Gynn Lane, Honley**

i) Has the impact of the proposal on heritage assets been adequately assessed and addressed? What are the implications arising from the Heritage Impact Assessment (LE75)? What effect would the provision of site access, visibility splays and a pedestrian footpath on the Gynn Lane frontage have on the heritage asset, the character and appearance of the locality, and protected trees?

The impact of the proposal on the heritage asset has been appropriately assessed and addressed in accordance with the NPPF (NE1). The Heritage Impact Assessment (LE75) provides an assessment of the potential impacts of the proposal on heritage assets, in this case the Grade II Listed dwellings on Gynn Lane to the west of the site. This assessment shows that the majority of this site is of slight significance to the heritage asset. The area of trees along the Gynn Lane frontage are listed as having considerable significance. These trees are subject to a

woodland Tree Preservation Order and have been removed from the developable area. This will be with the exception of the removal of some trees to provide access to the site (including visibility splays). In relation to the loss of trees, there is reference in the other site specific considerations to “*Substantial mitigation measures required due to the loss of a small number of protected trees to achieve access to this site. This will include measures such as new tree planting, additional open spaces, off site contribution towards tree enhancements in the local area*”. There is a remaining area of protected trees between the site and the heritage asset. A planning application for the re-development of H584 would be considered in accordance with policy PLP35 (Historic Environment, SD1, page 144). The site box for H584 does not refer to a pedestrian footway but the extent of the footway would be determined at the time of a planning application which would include consideration of the protected trees and impact on the heritage asset.

The area of the site shown as moderate significance is the north-western part of the site with suggested mitigation to retain the area of mature trees between the site and the heritage asset. These trees are outside the site boundary but are also subject to Tree Preservation Orders. In the context of this heritage evidence the allocation remains justified. In relation to this area of the site, policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE75 a reference document at the time of the determination of the planning application.

<p>H664 – land north of Scotgate Road (93 dwellings) (Green Belt release)</p>	<p>This site was assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The Local Plan site box clearly sets out the constraints including potential additional highways mitigation, noise from the adjacent farm, ecological considerations, listed buildings and the setting of Castle Hill. The required reports and listed in the site box.</p> <p>The Habitats of Principal Importance are adjacent to the site. Policy PLP30 (biodiversity and geodiversity) will be considered when assessing planning applications.</p> <p>The council have commissioned a Castle Hill Setting Study (LE63) and a site-specific Heritage Impact</p>	<p>The western part of this site which contains listed buildings has been removed from the developable area. No further constraints have been identified which would result in a reduction to the developable area. The indicative capacity is therefore appropriate as it is based on the remaining developable area using the approach set out in EX30.2.</p>	<p>The site is available as identified through the Call for Sites process and detailed information has been submitted by Barratt Homes through the Publication Draft Local Plan consultation (PDLP_AD2497).</p> <p>The site is deliverable as the identified constraints can be overcome. H664 is phased to deliver new homes from 2020/21 which is a realistic timescale as it reflects the current green belt policy constraint on this site.</p>	<p>The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site,</p>
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	<p>Assessment (LE79). In the context of this evidence the allocation remains justified and as set out in the detailed response to the Inspector's question below (i), the developable area has been reduced to take account of the listed buildings. Policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE79 a reference document at the time of the determination of the planning application.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p><b>Proposed modification to correct errors in the constraints box:</b></p> <ul style="list-style-type: none"> <li>• <b>Remove the following from the constraints box: <i>Heritage Impact Assessment</i> as it is also listed in the Reports required box</b></li> <li>• <b>Move the text '<i>Ecological Assessment</i>' from the constraints box to the reports required box.</b></li> </ul>			<p>it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.</p>
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	<ul style="list-style-type: none"> <li>• Amend the following text to correct an error: <u>This site is adjacent to</u> <del>Part of this site contains</del> a Habitat of Principal Importance</li> </ul>			
<p><b>H664 – land north of Scotgate Road, Honley</b></p> <p><u>i) Has the impact of the proposal on heritage assets been adequately assessed and addressed? What are the implications arising from the Heritage Impact Assessment (HIA) (LE79)? Does the non-developable area identified in the proposal correspond to the areas of ‘high’ and ‘considerable’ significance in the HIA? How would the provision of a footway along the Scotgate Road frontage affect the heritage asset?</u></p> <p>The impact of the proposal on the heritage asset has been appropriately assessed and addressed in accordance with the NPPF (NE1). This approach is set out in the HIA for H664 (LE79). Section 6 of the HIA, as set out below demonstrates that identified impacts can be mitigated, however it is considered appropriate to allow a range of mitigation measures to be considered at the design stage of the planning application and not be specified in the local plan. As such Policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE79 a reference document which will be taken into account at the time a planning application is determined.</p> <p>The heritage assets identified within site H664 are the Grade II listed Clitheroe Farmhouse and Barn. The Heritage Impact Assessment for this site identifies areas of differing significance within the site (LE79, page 15). This includes an area of ‘considerable’ significance including the heritage asset and immediate curtilage, ‘high’ significance to the west of the listed building.</p> <p>As the heritage asset is in the western part of this site where the site width narrows considerably, the site assessment had to consider whether any development could occur in the areas of greater significance. As this part of the site is very narrow the assessment of this site determined that in these specific circumstances no development could reasonably be accommodated in this part of the site. As such the site box for H664 (SD2, page 138) states that the western part of the site has been removed from the developable area. This non-developable area includes the areas of ‘considerable’ and ‘high’ significance in the Heritage Impact Assessment.</p> <p>The site box does not currently refer to the requirement for a footway along Scotgate Road. The provision of a footway along the frontage of the developable area would not impact on the areas of ‘considerable’ or ‘high’ significance identified in the Heritage Impact Assessment.</p>				

<p>H786 – land north-east of Westcroft (15 dwellings)</p>	<p>This site was assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The Plan site box provides clear guidance on the constraints including the proximity to the conservation area, setting of Castle Hill, protected trees and potential local highway links improvements.</p> <p>A Heritage Impact Assessment has been undertaken for this site (LE90) which concludes that this site contributes little to the conservation area and the loss of the site would result in negligible harm which can be mitigated by retaining the tree belt and landscaping of the northern boundary. The protected trees (including the trees in this northern part of the site) have been removed from the developable area. Policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE90 a reference document at the time of the determination of the planning application.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and</p>	<p>The indicative capacity of this site is appropriate as the protected trees have been removed from the developable area resulting in a realistic dwelling capacity. The indicative capacity has been calculated for the developable area based on the approach set out in EX30.2.</p>	<p>The site is available as identified through the Call for Sites process.</p> <p>This site is phased to deliver homes from 2019/20 which is realistic as the site is deliverable. The phasing is therefore appropriate in accordance with the approach set out in EX30.2.</p>	<p>N/A</p>
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	<p>scale of any mitigation measures required.</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>			
<u>Meltham</u>	a) Is the site suitable for the proposed use? In the case of employment and housing allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?	c) Is the site available and deliverable in the timescales envisaged?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
E1866 – land at Spinksmire Mill, Huddersfield Road (11,340 m2)	<p>This site is proposed as an accepted employment allocation and has been assessed in accordance with Local Plan Methodology Part 2: Site allocation methodology (BP23). Part of the site is an existing UDP Business and Industry allocation, located adjacent to an existing locally significant area of business and industry (PEA site KR8).</p> <p>The plan provides clear guidance on the requirements and constraints on page 17 of the Allocations and Designations document (SD2). These</p>	<p>An indicative capacity is provided (11,340 sq. m); this capacity is based on a net site area taking into account a non-developable area (BAP Priory Habitat).</p> <p>The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber ‘Translating Jobs into</p>	<p>This site is an existing UDP Business and Industry allocation; it has been assessed in the Kirklees Employment Market Strength Assessment (LE11) and may be attractive to the market. The site recognises potential development constraints in relation to contamination, minor topographical issues. Due to the presence of some</p>	N/A

	<p>could be addressed as part of a detailed planning application and the reports that maybe required to accompany the submission of a planning application have also been listed. Mitigation measures are also specified.</p> <p>A proportion of the site is located in Flood Zone 2 and 3a, as Meltham Dike runs in a culvert beneath the site, consideration should be given to opening up the culvert and this is listed as a site specific consideration. A flood risk sequential test, site-specific Flood Risk Assessment and appropriate mitigation would be required. The Flood Risk Technical Paper (BP24) sets out the Local Plan sequential test.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>	<p>Land' study by Roger Tym &amp; Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.</p> <p>The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.</p>	<p>residential in the area noise, air and odour constraints have also been identified. The technical appraisal of this site also recognises these issues but concluded none of which to be significant.</p> <p>This site was promoted by the landowner through the Council's Call for Sites exercise, the technical assessments have shown that contamination is not a significant issue on this site, therefore is available and deliverable during the plan period.</p>	
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**E1866 – land at Spinksmire Mill, Huddersfield Road, Meltham**

i) Does the proposal provide sufficient mitigation measures in relation to the protection and enhancement of biodiversity?

The proposal provides sufficient mitigation measures in relation to the protection and enhancement of biodiversity. The mixed deciduous woodland, pond and partly culverted beck are UK BAP Priority Habitats. The woodland and pond have been removed from the developable area. Enhancements to biodiversity will be considered through the planning application process, including, if the mill were to be demolished, de-culverting the beck under the mill and leaving a 10m stand-off either side. In this case Policy PLP 30 will provide protection of the biodiversity assets.

<p>H67 – land south of Helme Lane (172 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan site box clearly sets out the constraints and requirements including consideration of local highway improvements, surface water, presence of a noise source (adjacent industry) and presence of a listed building (on Helme Lane). The relevant reports required are set out in the site box to enable such factors can be overcome.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>The northern part of the site has planning permission for 88 dwellings</p>	<p>There are no known constraints on this site which would result in a reduction in the developable area. The capacity is consistent with the approach set out in EX30.2. The northern part of this site has planning permission for 88 dwellings.</p>	<p>This site is available as shown by the approved planning application (2014/93959, Barratt Homes) on the northern part of the site and the remainder of the site submitted through a Call for Sites process (also Barratt Homes).</p> <p>The phasing indicates the site starting in 2017/18. This timescale is justified as this site is currently under construction, the phasing is in accordance with the methodology in EX30.2 and there is an application (2016/93630) to modify part of the existing planning permission to allow access to the remainder of the site. The call for sites form</p>	<p>N/A</p>
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	<p>(2014/93959) which has resolved the site constraints and is under construction. There is an application (2016/93630) to modify part of the permission on the northern part of this site (2016/93630) to allow access to the remainder of the site and there is a reasonable prospect that the remaining constraints can be overcome.</p> <p>In accordance with the Habitats Regulation Assessment, a modification has been proposed to the H67 site box (as set out in SD4, reference AD-MM41).</p>		<p>indicates that the southern part of this site is also being promoted by Barratt Homes so there is a reasonable prospect the remainder of the site will be built out as anticipated.</p>	
<p>H200 – land south of Mill Moor Road (13 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan site box clearly sets out the constraints and requirements including consideration of pedestrian access, surface water and proximity to the Peak Park and SPA/SAC.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>This site has been granted planning</p>	<p>There are no known constraints on this site which would result in a reduction in the developable area. The site capacity reflects the planning permission capacity (now under construction).</p>	<p>This site is available as shown by the approved planning application (2015/93847, Berkeley DeVeer). The phasing indicates delivery of this site starting in 2017/18 which is justified as this site is now under construction and there are no reasons why the build rates set out in EX30.2 would not apply.</p>	<p>N/A</p>

	<p>permission (2015/93847) for 13 dwellings which is now under construction. As such the site constraints have been overcome.</p> <p>In accordance with the Habitats Regulation Assessment, a modification has been proposed to the H200 site box (as set out in SD4, reference AD-MM42).</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>			
H342 – land north of Mill Moor Road (37 dwellings)	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan site box clearly sets out the constraints including consideration of pedestrian access, potentially contaminated land, surface water and proximity to the Peak Park and SPA/SAC.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>The southern part of this site on the</p>	<p>Meltham Dyke and its associated flood risk in the far northern part of the site have been removed from the developable area (0.11ha removed) to provide a realistic capacity of 37 dwellings.</p> <p>This is supported by the planning permission (2017/92220) and planning application (2017/93015) on this site.</p>	<p>The site is available as identified through the Call for Sites process. The recent Reserved Matters planning permission (2017/92220, Conroy Homes Ltd) and planning application (2017/93015, Pennine Developments Ltd).</p> <p>The site is phased to start in 2019/20 which was a reasonable assumption taking account of the planning applications although as part of the site has now been granted permission some delivery</p>	N/A

	<p>frontage with Mill Moor Lane has been granted planning permission for housing (2017/92220) which indicates that such constraints have been overcome. The majority of the remaining area is subject to a planning application (2017/93015) which has demonstrated a surface water solution.</p> <p>In accordance with the Habitats Regulation Assessment, a modification has been proposed to the H342 site box (as set out in SD4, reference AD-MM45).</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>		<p>may occur earlier than expected.</p>	
<p>H343 – land north of Helme Lane (46 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology. The Local Plan site box clearly sets out the constraints including site access constraints, proximity to a conservation area, presence of a woodland to the east and proximity to the Peak Park and SPA/SAC. The appropriate reports required are listed in the site box.</p> <p>High level site access and local highway constraints have been considered within the context of the</p>	<p>The developable area of the site has been reduced to take account of the proximity of woodland to the east of this site in accordance with comments received from West Yorkshire Ecology. The capacity is appropriate as it has been calculated based on the developable area in accordance with the approach set out in</p>	<p>This site is available as shown by the Call for Sites submission and more recently an outline planning permission (2016/93411, Conroy Homes Ltd).</p> <p>This site has been phased to start in 2019/20 in accordance with the assumptions in EX30.2 which is achievable as there is a willing</p>	<p>N/A</p>

	<p>site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>The constraints listed have been overcome as this site has now been granted outline planning permission (2016/93411). In accordance with the Habitats Regulation Assessment, a modification has been proposed to the H343 site box (as set out in SD4, reference AD-MM44).</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>	EX30.2.	landowner and outline planning permission has been granted but a reserved matters application has yet to be submitted.	
H784 – land north of 105-135 Mill Moor Road (32 dwellings)	<p>This site was assessed as suitable using the Local Plan site allocations methodology. The Local Plan site box clearly sets out the constraints including surface water drainage and proximity to the Peak Park and SPA/SAC and SSSI. The appropriate reports required are listed.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application</p>	There are no known constraints on this site which would result in a reduction in the developable area. The site capacity is appropriate when taking account of the planning permission covering the majority of the site which provides access to the remaining small area of land.	This site is available as shown by the planning permission covering the majority of the site (2015/93861, Heywood Homes, 28 dwellings). This permission provides access to the small remaining area of land to the west.	N/A
			The site has been phased as delivering homes from 2017/18 which is justified	

	<p>will inform and direct the nature and scale of any mitigation measures required.</p> <p>The constraints have been overcome through the planning application process as application 2015/93861 covering the majority of the site has been approved and is now under construction.</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>		<p>as the site is now under construction.</p>	
<p>H785 – land east of Colders Lane (27 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan site box clearly sets out the constraints including a culverted watercourse and proximity to listed buildings. The required reports are listed in the site box.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>	<p>No constraints were identified which would result in a reduction to the developable area of this site. The indicative site capacity is therefore appropriate taking account of the site constraints and provision of the necessary infrastructure.</p>	<p>This site is available as shown by the latest planning permission (2016/92254, J P Wild Ltd).</p> <p>The site is phased to start delivery in 2019/20 which was justified based on the information available at the time of the assessment. Full planning permission has now been granted and the site is under construction which indicates that this site is likely to deliver homes earlier than anticipated.</p>	<p>N/A</p>

	<p>The constraints have been overcome through the planning applications process as this site has full planning permission for housing (2016/92254) which is now under construction.</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add “Transport Statement” to the Reports required section of the site box.</b></li> </ul>			
SL2186 – adjacent to Spinksmire Mill, Huddersfield Road	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that specific site constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available. A further assessment of the site constraints would be required at the review of the Local Plan.</p> <p>There is a current planning application on this site (2017/91505, outline application for erection of residential</p>	<p>No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.</p>	<p>The site is available as identified through the Call for Sites process.</p> <p>At the time of the assessment there was insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031.</p> <p>The current planning application seeks to address the access constraints but this</p>	N/A

	development) which seeks to address the access constraints but this application has not yet been determined.		application has not yet been determined.	
SL3365 – land to the west of Hebble Mount	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>At present there is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period given potential visual impacts on the national park. However there is a reasonable prospect that specific site constraints can be overcome through a fuller assessment of these impacts and appropriate mitigation. As such the site is capable of coming forward for development post 2031. Given proximity to SPA housing development would need to be subject to a separate plan wide Habitat Regulations Assessment when the development plan is reviewed. A further assessment of the site constraints would be required at the review of the Local Plan.</p>	No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.	<p>The site is available as identified through the Call for Sites process.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031.</p>	N/A

Brockholes	a) Is the site suitable for the proposed use? In the case of employment and housing allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure?	c) Is the site available and deliverable in the timescales envisaged?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
E1829 – former Brook Motors Playing Fields, New Mill Road (5,215 m2)	<p>This site is proposed as an accepted employment allocation and has been assessed in accordance with Local Plan Methodology Part 2: Site allocation methodology (BP23). It is located within an existing locally significant area of business and industry (PEA sites KR15 and KR16) and adjacent to the River Holme. The plan provides clear guidance on the requirements and constraints on page 16 of the Allocations and Designations document (SD2). None of these are considered as significant and all could be addressed as part of a detailed planning application. The reports that maybe required to accompany the submission of a planning application have also been listed and potential mitigation measures specified.</p> <p>The whole of the site lies within Flood Zone 3a, therefore a flood risk sequential test, site-specific Flood</p>	<p>An indicative capacity is also provided (5, 215 sq m); this capacity is based on a net site area taking into account a non-developable area (BAP Priory Habitat).</p> <p>The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber 'Translating Jobs into Land' study by Roger Tym &amp; Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part</p>	<p>This site was promoted by the landowner through the Council's Call for Sites exercise to help meet employment needs of the area, enabling local businesses to relocate or expand and to create new employment opportunities. Their ambition is for the site to be used for business and industry in the medium to long-term (but within the plan period). As such this site is considered as available and deliverable in the timescales envisaged.</p>	N/A

	<p>Risk Assessment and appropriate mitigation would be required. The Flood Risk Technical Paper (BP24) sets out the Local Plan sequential test.</p> <p>The proposal provides sufficient mitigation measures in relation to the protection and enhancement of biodiversity. River Holme is a UK BAP Priority Habitat. This Priority Habitat, including a 10m buffer zone from the river has been removed from the developable area to ensure that disturbance to wildlife is low. Enhancements to biodiversity will be considered through the planning application process, including opportunities for improving riparian habitat along the River Holme and improving fish passage at Crossley Mill weir.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p><b>Proposed modification to reports required: Replace Transport Statement with Transport Assessment</b></p>	<p>of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.</p> <p>The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area</p>		
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**E1829 - former Brook Motors Playing Fields, New Mill Road, Brockholes**

i) Is the proposed allocation consistent with paragraph 74 in the National Planning Policy Framework (NPPF) in relation to the loss of open space and sports facilities?

The Council considers that this is consistent with paragraph 74 of the National Planning Policy Framework (NPPF) and can confirm a Playing Pitch Strategy and Action Plan (LE124) has been carried out. This is a lapsed youth pitch that has not been used for over ten years (page 28). It would require investment to be brought back in to use. The recommendation of this strategy is to protect and enhance and with improvements, pitches could help to reduce current shortfalls in the area (page 89).

Sport England no longer object to this site as that the following wording is included in the site allocations box regarding replacement provision:

*“Replacement playing pitch provision or mitigation measures of equivalent value will be required to meet local needs having regard to the most up-to-date evidence for sport and recreational needs”.*

On this basis the Council considers that this approach is consistent with NPPF paragraph 74 (bullet 2) regarding replacement sport and recreation facilities.

<p>H129 – land east of Woodhouse Road (124 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP27). The Local Plan site box clearly sets out the constraints including additional mitigation on the wider highway network, noise from industrial uses in the north of the site (the closest of which are adjacent to the part of the site with outline planning permission 2013/93373) and that an ecological assessment is required as the site is part of the Wildlife Habitat network and contains a Habitat of Principle Importance (this area has been removed from the developable area). The relevant reports required are also set out in the</p>	<p>The developable area of the site has been reduced to take account of woodland within the site and land adjacent to the River Holme. This results in an appropriate indicative site capacity for the remaining developable area based on the approach set out in EX30.2.</p>	<p>The site is available as identified through the Call for Sites process and more recent planning applications.</p> <p>The site is phased to start delivering in 2019/20 which is appropriate in the context of the outline planning permission (2013/93373) and a full application for 70 dwellings on the same part of the site (2017/92568) which will allow delivery in accordance with the</p>	<p>N/A</p>
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	<p>site box.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>Reference to the Crossley Mill weir and the main river have been added as constraints following comments from the Environment Agency but these are on the eastern edge of the site which has been removed from the developable area.</p> <p>The western part of this site has outline planning permission (2013/93373) with a full application also submitted on the same part of the site (2017/92568, not yet determined).</p>		<p>timescales set out in EX30.2.</p>	
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**Matter 43: Impact of the allocation on the Green Belt and the purposes of including land within it**

**Holme Valley North**

**Green Belt Review tests 2 and 3**

The edge reference and value reflects the Green Belt Review outcomes (SD19 and SD20)

Tests 2a to 2c are site specific assessments of the degree to which land performs a green belt role and function following the methodology for those tests set out in the Green Belt Review (SD19)

Test 2d defaults to 'green - no impact' in all cases. This follows Stage 1 hearing discussions and is set out in the Council's note; Green Belt Review (SD19) Test 2d Reassessment (ID17). Struck-through text removes reference to the setting of historic assets.

Test 3: One of the purposes of including land in the green belt is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (Green Belt Review page 17). By constraining the potential for the expansion of built-up areas the green belt will direct development pressure towards opportunities to recycle land within urban areas and thereby achieve urban regeneration. The green belt is considered to support this green belt purpose equally throughout Kirklees. Test 3 is not included within the Green Belt Review matrix (Green Belt Review Appendix 1) and the Test 3 column is therefore neutral.

**Site Allocation Methodology**

Site specific assessment of the ability of the site to present a strong new green belt boundary and its relationship to the existing settlement form, following the assessment methodology set out in BP23 Local Plan Methodology Statement Part 2

		Green Belt Review					Site allocation methodology		
Option	Edge ref and value	Test 2		Test 3			Suitability of potential boundary	Relationship to settlement	Assessment set out in BP29.1
		2a: merger	2b: sprawl	2c: encroachment	2d: historic towns	urban regeneration			
H48 Travel Station Yard Honley	HB18_1	No impact	Well contained	Not part of wider countryside	No impact		Good	Rounding off	This site already contains built form and associated surface infrastructure. It does not play a strategic role and is separated from the wider green belt by the line of the railway. This site could be released without harm to the role and function of the green belt.
H178 Southwood Avenue Hall Ing	HB14_B	No impact	Some degree of sprawl to south	Some visual impact but limited by topography	No impact		Weak on western edge but opportunity to create stronger boundary than existing	Settlement extension - some rounding off. Additional land release required	The majority of this site is within the settlement of Hall Ing. The area of the site that is green belt is proposed to allow access through to Southwood Avenue. Although located on a slope the configuration of the site respects the settlement form and would not sprawl down the slope. There is an existing road/track which could present a new green belt boundary although the site breaches this line where it meets 14 and 16 Southwood Avenue . It is not a particularly strong feature but appears more defensible than the existing green belt boundary which runs across the field.
H2586 Thirstin Mills Honley	HB22_B	No impact	Marginal	Marginal	No impact		Good	Settlement extension - on existing developed footprint	This site forms part of the Thirstin Mills brownfield redevelopment site that has received permission for residential development. That part of the option that extends into the green belt consists of part of the extreme western edge of the site which is the retaining wall that marks the change in levels between the site and the land to the west, and which has been reinforced as part of the redevelopment of the mill site. At such its green belt role is limited and it could be released from the green belt without impact.
H584 Gynn Lane Honley	HB12_2, HB13_B	Restricted gap to Hall Ing	Well contained but development on rising land to east may appear as sprawl	Countryside character but limited visual relationship to wider countryside	No impact		Good	Settlement extension. Additional land release required	This site is contained on three sides by existing residential development, significant tracts of protected trees and the line of the railway. Its southern boundary is formed by field boundaries which present a strong new boundary to the green belt. As such there is little risk of further encroachment and no risk of sprawl. The trees provide containment but would become somewhat isolated from their wider countryside setting by any new development.
H664 Scotgate Road Honley	HB23_2	No impact	Well contained	Limited relationship to countryside	No impact		Good	Settlement extension. Additional land release required	The extent of the unconstrained development represented by this option would have limited impact on openness as it is entirely contained by trees and landform. There is no risk of sprawl and the land has little visual relationship with the wider countryside.