

Planning Statement

Client: Strata Homes (Yorkshire) Ltd

Proposal: Publication Draft Kirklees Local Plan – Strategy and Policies/Allocations and Designations/Community Infrastructure Levy

Site: H442 – Land at Roberttown

Date: December 2016

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Appendix 1 Extract from Green Belt Review for site H442
 Prepared by Smeeden Foreman

 Date: January 2016

1.0 Introduction

- 1.1 WYG (formerly Signet Planning) is appointed by Strata Homes (Yorkshire) Ltd 'Strata Homes' to submit representations to the Publication Draft Kirklees Local Plan – Strategy and Policies, Allocations and Designations as well as the Community Infrastructure Levy (November 2016) together with the related evidence base documents.
- 1.2 Strata Homes have a landholding interest in the Kirklees District which has been actively promoted on an upfront basis as part of the Local Plan process. It features as Site Reference 812 – Land to the south of Richmond Park Avenue, Roberttown in the SHLAA 2015 Assessment and Ref No. H442 in the Local Plan evidence base. For the purposes of our representations the site is known as the 'Roberttown Site'. These representations focus on the decision made by Kirklees MBC to allocate this specific site for housing purposes within the draft Local Plan which we support in principle. It is known in the draft Local Plan as Site No H442 – land between Richmond Park Avenue and Sunnyside Avenue.
- 1.3 Section 2 of this report will initially outline the detailed technical and environmental evidence base that Strata Homes and their consultancy team has already undertaken to demonstrate that the site is available, suitable and deliverable to support the future housing growth of the district. Our Development Framework Report dated October 2014 which initially promoted the site was formally submitted to the Local Authority in October 2014 and the level of justification goes well beyond that which is typically requested at an early stage in the Local Plan making process. It is our view that these technical assessment details continue to be relevant and it clearly emphasises the commitment of Strata Homes to fully embrace the Local Plan process of evaluating the housing proposal. The Development Framework Report we have prepared should be given substantial weight in the decision making process.
- 1.4 Section 3 of this report looks specifically at the Council's assessment of the Roberttown site and we provide our views and responses to demonstrate the areas of differences as well as agreement with the Council's approach. As part of our case, Strata Homes have also commissioned Smeeden Foreman to prepare a Green Belt Analysis to examine in more detail the Council's methodology for reviewing Green Belt. This was prepared in the context of the previous Local Plan draft released in November 2015 and providing further assessment of our site and other potential sites to determine whether they should be considered for release from Green Belt. Relevant extracts of this report are provided in appendix 1 and these conclusions should be read in conjunction with these representations.

- 1.5 Section 4 specifically reviews the objectively assessed housing need and the housing land supply particularly commentary on the projected future windfall allowances and the proposed housing trajectory rates through the lifetime of the Plan Period.
- 1.6 Section 5 specifically addresses other Strategy and Development policies that feature in the Publication Draft Local Plan that are relevant to developing housing on the Roberttown site that have not already been addressed in the above sections.
- 1.7 Section 6 examines the Community Infrastructure Levy Draft Charging Schedule and we provide representations in the context of promoting site H442 'The Roberttown site'.
- 1.8 Paragraph 182 of the Framework outlines criteria which an independent Inspector will use to assess the soundness of the Local Plan. In summary, the key tests for soundness are that the Local Plan should be:
- Positively prepared;
 - Justified;
 - Effective, and
 - Consistent with National Policy.
- 1.9 Whilst we support the allocation of Site H442 for housing purposes there are a number of areas of the Local Plan which we consider do not meet the above tests of soundness and these will be addressed in the following sections of this report.

2.0 Section 2: Suitability, Availability and Deliverability of the Roberttown Site/Local Plan Ref H442

2.1 The Framework encourages frontloading of the planning system to address key issues and considerations. Paragraph 158 of the Framework acknowledges that policies and proposals should be based on adequate, up to date and relevant evidence. As a responsible housebuilder, Strata Homes have commissioned a consultancy team to provide sufficient evidence at this stage in the process to demonstrate the Roberttown site is both suitable, achievable and deliverable. These technical disciplines include the following:

- Planning Advice and Co-ordination of representations to the Local Plan process – WYG (formerly Signet Planning);
- Drainage Assessment prepared by Haigh Huddleston Associates – dated 7th October 2014;
- Flood Risk Assessment prepared by Haigh Huddleston Associates – dated July 2014;
- Landscape and Visual Assessment including Green Belt Considerations prepared by Smeeden Foreman dated September 2014;
- Green Belt Analysis (Issue 1) prepared by Smeeden Foreman dated January 2016;
- Ecological Appraisal prepared by Smeeden Foreman dated July 2014;
- Transport and Access Appraisal Feasibility Study prepared by Fore Consulting dated September 2014;
- Urban Design and Masterplanning work prepared by Signet Planning Ltd dated October 2014.

- 2.2 The environment and technical work undertaken to date has informed the understanding of the site constraints, the opportunities and the potential mitigation measures required as well as the effect of development capacity. Whilst there have been specific technical reports prepared for the above key disciplines (and can be provided if required), an overarching document entitled 'Development Framework Report' was prepared and formally submitted to the Kirklees Council in October 2014. We have not submitted this document with these representations but it can be made available (if required) to justify the suitability of the proposed allocation. These details still remain valid and the level of technical work is proportion to the stage reached in the process and the information has demonstrated there are no fundamental issues to prevent the development coming forward and the constraints identified can be mitigated. The urban design and masterplanning work has spatially tested the evidence to demonstrate that a certain scale of development is sustainable, suitable and deliverable.
- 2.3 The preparation of the supporting technical evidence has been guided by addressing the following key issues:
- Identification of clear objectives intended to be achieved for the development;
 - Identification of key planning and technical constraints including those that are fixed and those that need to be overcome through mitigation;
 - Identification of the overall scale and quantum of land uses across the site;
 - The identification of infrastructure needs to ensure that the development is viable, attractive and sustainable;
 - The identification of an implementation route map identified next stages and any potential refinements beyond demonstrating that there are no 'showstoppers'.

Local Facilities

- 2.4 The site is well related to existing services and facilities. In terms of provision of education facilities, there is a nursery immediately to the north of the site and three primary schools within 15 minutes' walk of the site. There is also a secondary school (Spen Valley High School and Sports College) located within five minutes' walk of the site on Roberttown Lane.

- 2.5 In terms of access to healthcare facilities, there are several medical practices situated just over 15 minutes' walk. The site also benefits from good local shops along Roberttown Lane within a 15 minute walk west of the site.

Connectivity

- 2.6 The site is well served by a range of bus services operating on roads adjoining the site with regular connections to larger towns and cities including Leeds, Bradford and Huddersfield.
- 2.7 Dewsbury, Ravensthorpe and Mirfield Railway Stations are all situated approximately 3-3.5 miles from the site which are within a reasonable catchment area for cyclists. As referred to above, within the catchment area of 2km there are many local facilities including convenience stores, pubs, restaurants, schools and recreation facilities. It is therefore considered that the site is situated in a very sustainable location well related and accessible to a wide range of services and facilities.

Summary of Baseline Technical Assessment Work

- 2.8 To demonstrate the assessment work undertaken as part of the preparation of the 'Development Framework Report' (October 2014) we set out below a summary of the technical work:

Ecological Assessment

- 2.9 An extended Phase 1 Habitat Survey has revealed that other than protecting a number of mature trees on site which had the potential to house bat roost and any development work should be conducted outside of the bird nesting season, there were considered no habitats within the site or adjacent to it considered suitable to support protected species. The site comprised predominantly of improved grassland, tall ruderal, dense and scattered scrub and hedgerows all of which are not considered to be of significant ecological importance. A clear recommendation of the ecological mitigation was to seek to enhance local biodiversity through incorporating native planting and wildlife grassland to enhance foraging and nesting birds which can be achieved as part of the development.

Landscape and Visual Assessment

- 2.10 Landscape Consultants Smeeden Foreman concluded in their Landscape and Visual Impact Assessment dated October 2014 (Rev A) that the landscape character is identified within the Urban Fringe Character Area which is considered to be of medium sensitivity because although it is a green area, it is within an urban setting surrounded by housing and a secondary road.
- 2.11 In terms of visual amenity, our landscape assessment identifies 13 viewpoint locations. Five viewpoints were deemed to have a 'neutral' impact. Five other views were considered to have a 'minor adverse' overall impact with two viewpoints having a 'moderate adverse' impact. Only one of the views was considered to have a 'major adverse' overall impact. These more sensitive receptors are in close proximity to the site due to the amount of enclosure and built structures around the site. From the east, south and west, the site is already screened by a continuous ribbon of high density housing. To the north of the site there are open views towards the site's location. However, the view in this location is partially obscured by a band of mature vegetation along Roberttown Lane. The distant viewpoints from the north are such that any proposed housing scheme on the site of a domestic scale would remain in context with the surrounding landscape features and fit into the existing landform. A zoomed in photograph below of Viewpoint 10 from the LVIA illustrates this point.



Fig 1: Photograph of viewpoint 10 from LVIA dated September 2014

Green Belt Assessment

2.12 An analysis of the viewpoint locations in the Smeeden Foreman October 2014 LVIA reveals that the essential characteristic of openness of this site has already been compromised. A further analysis by Smeeden Foreman in the context of the representations submitted in February 2016 continues to maintain this opinion (see Appendix 1). Given the site is strongly defined with urban features, and there is a strong degree of enclosure, the loss of Green Belt would have little impact on the overall purposes of this designation. The Kirklees Green Belt Review (2011) clearly shows the level of enclosure and containment of the site.

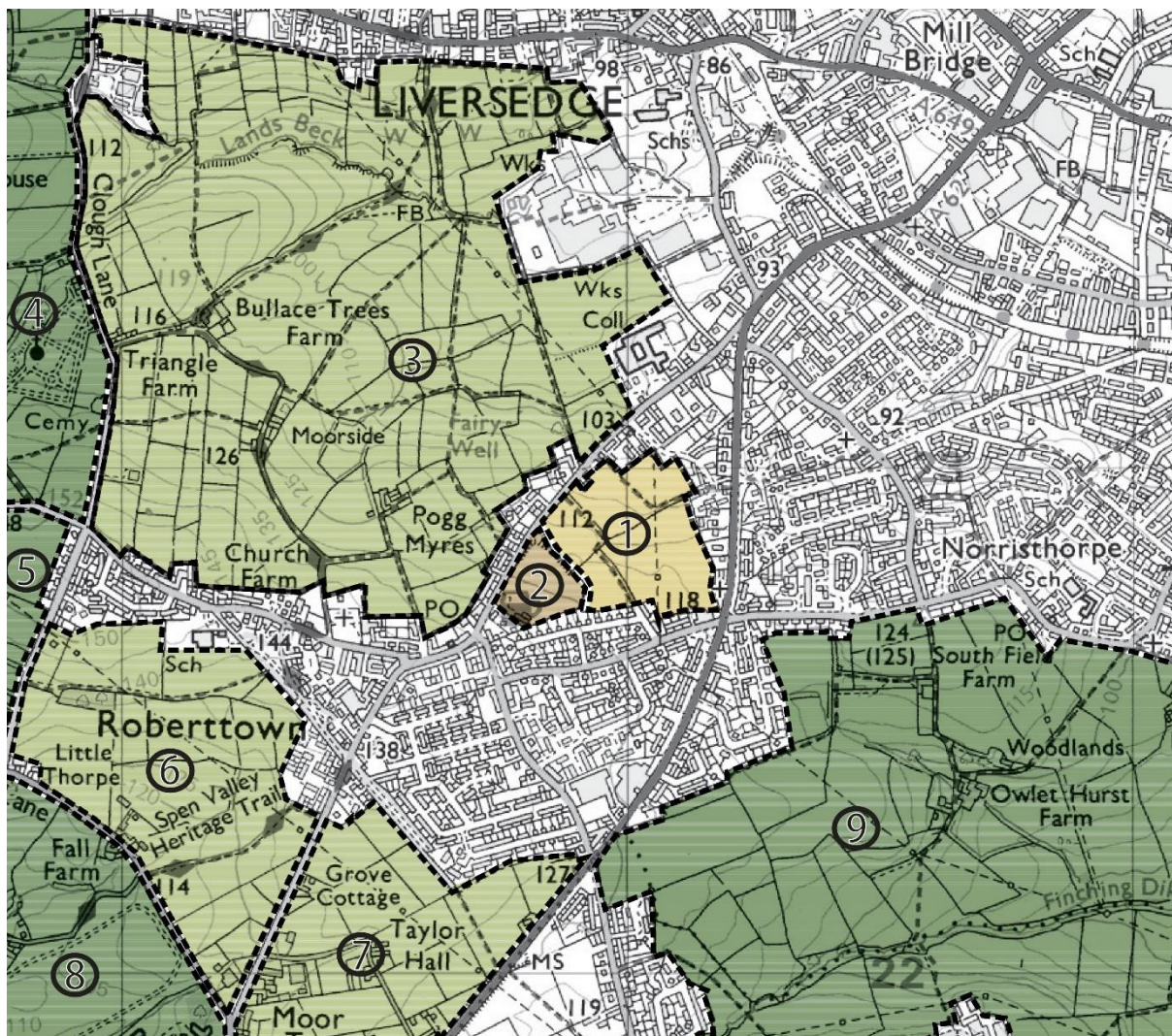


Fig 2: Extract from Kirklees Green Belt Review (2011)

Vehicle Access and Transport Effects

- 2.13 Fore Consulting has undertaken an initial Transport Assessment of both the vehicular access into the site as well as the traffic effects of the development.
- 2.14 The preferred means of vehicular access into the site would be from Roberttown Lane, however, there are potentially two other secondary access points from Stanley Road to the south and Richmond Park Avenue to the east that could also be used to create highway permeable development.
- 2.15 The Transport Assessment has identified three junctions on the highway network that may have a material impact. However, with appropriate mitigation it can be demonstrated that the impact of the additional traffic generated by the development can be adequately accommodated on the road network and should have no adverse impact on the safety and free flow of traffic.

Flood Risk and Drainage

- 2.16 From the Environment Agency's Flood Map the site is located entirely within Flood Zone 1 and therefore it is considered to be at low risk from watercourse and river sources. There is also considered to be a low level of risk from overland flows from adjacent land and service water flooding.
- 2.17 Ground conditions are unlikely to be suitable for soakaways and therefore surface water drainage is proposed to be stored in oversized pipes and detention basins on site in the lower north eastern area. The nearest suitable offsite watercourse (Tan House Beck) is located approximately 500m to the north of the site which eventually outfalls to the River Spen to the east. Our drainage consultant has recommended solutions that can provide a suitable system to enable and outfall to be provided to Tan House Beck.
- 2.18 Our drainage consultants have confirmed that the Waste Water Treatment Works at Mitchell Laithes has sufficient capacity to accommodate the scale of development proposed. In terms of the sewer network it has been established from the site survey that not all the site may be able to discharge directly into the combined sewer in Roberttown Lane via a gravity connection. Yorkshire Water have therefore agreed that a maximum of 60 properties may discharge into the 150mm diameter foul sewer in Richmond Park Avenue.

Technical Overview

2.19 The technical assessment work that we have undertaken as part of the initial masterplanning work clearly demonstrates that there are no fundamental constraints that would prevent the site coming forward subject to reasonable mitigation measures. As such the site is clearly deliverable particularly when considered in the context of it being promoted by a reputable regional housebuilder who is keen to commence construction.

Developing the Masterplan

2.20 Based on the understanding of the context of the site and the technical information which is summarised above, a series of Framework Plans were developed to demonstrate how the site could be developed for housing ensuring the protection and enhancement of landscape and ecological features as well as creating a place for people which is well connected and integrated into the surrounding area.

Movement Framework

2.21 The Movement Framework drawing (see page 10) sets out a clear vision for how vehicles and people could move around the development creating connectivity and circulation within and adjacent to the site. The primary access route is taken off Roberttown Lane running in a south to north direction aligning with the existing hedgerows. As recommended by the Transport Assessment two separate access roads could be taken from Stanley Road and Richmond Park Avenue. These potential access points would not be connected thus avoiding 'rat runs'. However, the routes could be designed to allow for pedestrians and cyclists to ensure permeability. The Framework Plan clearly demonstrates a permeable network of streets and footpaths creating an integrated development to encourage walking and cycling to access the wide range of facilities in the local area.



Fig 3: Movement Framework

Green Infrastructure Framework

2.22 The Green Infrastructure Framework drawing below identifies opportunities to retain and enhance existing site features and provide new green spaces. There will be an opportunity to provide space to integrate the existing hedgerows as well as incorporate new planting, swales and dry detention basins. There is also the opportunity to provide a centrally located area of openspace including a play area. Existing hedgerows and trees on the perimeter of the site are shown to be retained and the north east corner is the lowest part of the site and is therefore the most suitable location to provide surface balancing ponds.

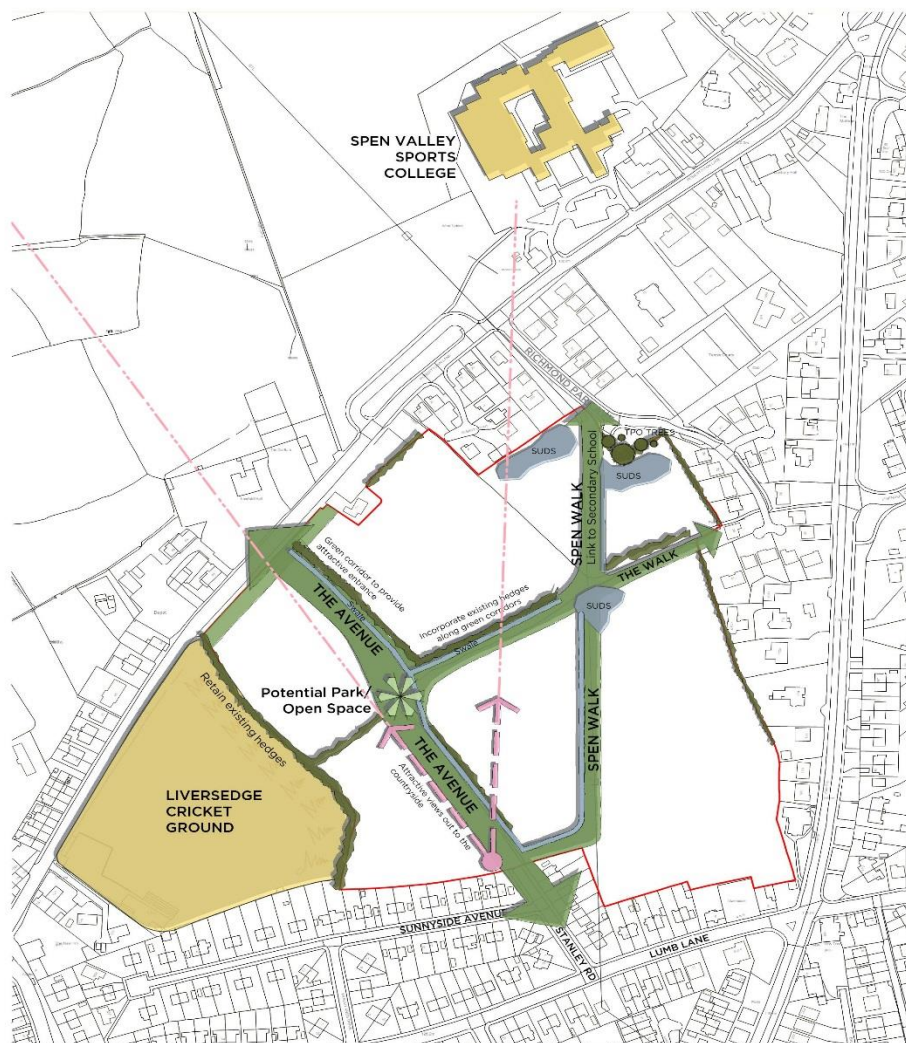


Fig 4: Green Infrastructure Framework

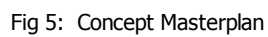
Concept Framework

2.23 The Concept Masterplan drawing on page brings together with the work to date in terms of positively addressing potential constraints, identifying infrastructure requirements as well as creating its own unique identity. The key elements of the proposal are as follows:

- Roberttown Lane frontage – creating an attractive entrance into the development and retaining existing drystone wall;
- Spinners Way and the Green Way – these are the primary routes through the development and could have swales, hedges and street trees parallel to the road;
- The Circus – this would be a key feature space within the development incorporating openspace, play areas and pedestrian routes;
- The Courtyard/The Walk/Cotton Road – these are secondary streets that would have their own unique appearance.

2.24 The site measures 7.8Ha in size and it is envisaged that 1.2Ha of this would be set aside for greenspace accommodating balancing ponds, swales, green corridors, play equipment and informal openspace area.

2.25 The balance amounts to 6.6Ha (85% net area) and based on a density which reflects the surrounding area this would generate approximately 250 dwellings.



Planning Strategy and Delivery

- 2.26 In terms of the anticipated timing for the release and implementation of Site H442 we note at Appendix 3 in the Draft Strategy and Policies Local Plan the table 'Housing Delivery and Phasing' that the Council envisages the site commencing in 2018/2019 at a build rate of 50 dwellings per annum.
- 2.27 Given the site is currently designated as Green Belt in the adopted UDP, the opportunity to develop the site for housing is influenced to a large degree by the timescales relating to the Local Plan process. Against this background it is considered the earliest a planning consent could be forthcoming without risk of a 'call in' from the Secretary of State is following the formal adoption of the Local Plan including the legal challenge period. From the Local Development Scheme (LDS) the timetable and milestones confirm that the anticipate date of adoption for the Local Plan is 'Early 2018'. To achieve the suggested timing of delivery for the site set out with Appendix 3 of the draft Local Plan this will require the preparation and co-ordination of a planning application to be progressed so that it can run in tandem with the Local Plan process. By adopting this approach the application can be determined soon after the plan is adopted. Whilst there are clearly commercial risks associated with this approach, Strata Homes are prepared to positively consider progressing such a planning strategy given the detailed technical work already undertaken. It would also be reliant on the Council engaging in a positive and supportive manner to provide constructive feedback driving the processing of a major application.
- 2.28 We would not at this stage envisage that any application be determined in advance of the adoption of the Local Plan therefore the delivery of the site would be closely aligned with LDS timetable and so if for whatever reason the process and programme is prone to slippage then this could ultimately delay the delivery of the site.
- 2.29 In terms of the proposed built out rate we consider that a target of 50 dwellings per annum is a reasonable assumption to make at this stage given the market conditions of the locality and the ability of the site to accommodate a number of starts on site given the available access points from Roberttown Road, Richmond Park Avenue and Stanley Road.



Conclusions

2.30 The comprehensive assessment work we have undertaken to date provides strong evidence to demonstrate the suitability and deliverability of this site coming forward in the short term to support the required level of growth for the district. The Development Framework Report submitted to your Authority in October 2014 and summarised in this section has demonstrated the site is sustainable and there are no major constraints associated with facilitating the required scale and mix of development. The masterplan process we have undertaken has ensured that a clear and systematic assessment of the main issues has been undertaken to create a sense of place by maximising the opportunities of this site whilst positively addressing the potential constraints.

3.0 Assessment of Roberttown Site (Ref No. H442) Against Local Plan Evidence Base Work

3.1 We have reviewed the various background evidence base documents associated with the draft Local Plan in the context of the work we have undertaken and is summarised in Section 2. Particular regard has been given to the following:

- Sustainability Appraisal Report prepared by LUC – October 2016
- Accepted Site Options Report – Technical Appraisals November 2016
- Summary of Main Changes – November 2016
- Kirklees SHLAA 2014;
- Green Belt Review – November 2016
- Green Belt -Boundary Changes – November 2016

3.2 As set out in the previous section to our representations, the site at Roberttown (which we are promoting) provides more detailed technical and environmental assessment work beyond normally anticipated at this stage in the Local Plan process. This section of our representations, therefore, seeks to assess the work that we have undertaken and compares it against the analysis of your Council's evidence base work to support the Local Plan. Using the Sustainable Appraisal report as a basis, we have reviewed these SA objectives individually against our own professional judgement within the context of the additional technical information we have available. The following summary table responds to the Council's Sustainability Assessment for the site and identifies where the SA score should be improved as well as identifying any anomalies or discrepancies against the other evidence base assessment work undertaken by the Council.

Sustainability Appraisal Review

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
1. Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	++	++	We agree with the Council's assessment of this objective.
2. Achieve an economy better capable of growth through increasing	0	0	We agree with the Council's assessment of this objective.

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
investment, innovation and Entrepreneurship.			
3. Ensure education facilities are available to all.	++?	++	We would agree that the site is highly accessible to both primary school and secondary school locations. It is interesting to note that the SA does not address capacity of the local schools to accommodate new pupils. However, capacity seem to feature within the Rejected Site Option report which suggests there is a need for additional capacity within the catchment area as the site is over 50 dwellings or above. As the provision of school places will be delivered through the CIL infrastructure mechanism, it is considered that greater weight should be given to the SA relating to the location of school facilities in relation to the site.
4. Improve the health of local people and ensure that they can access the health and social care they need.	+	+	We support the positive score.
5. Protect local amenity including avoiding noise and light pollution.	--	0	The SA describe the site as aligned directly adjacent to the A62 (Huddersfield Road) which could result in future residents being exposed to noise over the long term. We consider this is not a true representation of the site as there is existing properties fronting the A62 and this buffer will reduce the noise issue associated with the site. Whilst the site has a strong relationship to the existing residential properties, the rationale that these residents would be exposed to noise and light pollution during construction should not be given significant weight as appropriate conditions would be imposed during the construction phase of the development and it would only be for a temporary period. We recommend that the effect of amenity on either the prospective or existing residents would be negligible and so should be graded on this basis. From the Rejected Site options matrix Environmental Protection is graded Amber on the basis that the presence of constraints such as land contamination or proximity to serious noise sources such as motorway but where mitigation could be achieved. Based on our evidence we would

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
			recommend that it should instead be graded green (i.e. no significant constraints).
6. Retain and enhance access to local services and facilities.	+	++	We would agree that the scale of development could potentially stimulate the provision of local services and facilities and there is clear recognition that the majority of the site is within five minutes travel time of a local centre. We consider that a significant positive effect is likely.
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	0	+	As is clear from the masterplanning work we have undertaken, the layout has had regard to incorporation of greenspace which would have a high level of surveillance to increase the perception of personal safety. Therefore, through the masterplanning work we have done the certainty should increase the score to a minor positive effect.
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	++ / - -?	++	Similar to above, the detailed masterplanning work undertaken has demonstrated that the layout is able to provide new recreation facilities and areas of open space which have a multi-functional use. The Council's grading appears to be mixed based on the potential impact of two PRoW footpaths within the site but again the layout has accommodated these uses in order to create a highly permeable and accessible development. Therefore, we consider a significant and positive effect is likely.
9. Ensure all people are able to live in a decent home which meets their needs.	++	++	We would agree with the Council's SA score as the housing development can provide a range of house types as well as proportion of affordable housing.
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	++	++	We would agree that the site is highly accessible by a range of sustainable modes of transport to key services and facilities.
11. Secure the efficient and prudent use of land.	--	-	It is recognised that there is now insufficient housing land to fulfil the identified housing need on previously developed land only. Whilst there is a predicted negative score against this objective, it is clear the Council would need to release greenfield sites to meet the housing need. As the site is in an accessible location and the majority of the site is not within an area of quality

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
			agricultural land, the site should be seen as the first priority to direct development.
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	--?	-	From the Smeeden Foreman Assessment it concludes there is a moderate landscape structure, however, rural features are few.
13. Protect and enhance the historic environment, heritage assets and their settings.	?	0	The Council have not scored this issue given the potential uncertain impacts on the Old Hall Farmhouse Grade II* Listed Building. This is situated to the north of the site on the opposite side of Roberttown Lane and we consider it is not part of its immediate setting. Furthermore, the masterplan layout shows a strip of landscape planting along Roberttown Lane to screen views of the site from the north. Based on this additional level of detail we consider that the site will have a negligible impact on this SA objective.
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	0?	0	As a result of the Phase 1 desk top assessment survey, as well as the mitigation measures identified within the masterplan there are no sensitive ecological or biodiversity issues. As such, the development will have a negligible impact on this SA objective.
15. Reduce air, water and soil pollution.	0	0	As the site is not within or directly adjacent to an AQMA, we would agree that there would be a negligible effect on this SA objective.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	-	0	Whilst the site is on greenfield, the entire site is located within Flood Zone 1. Furthermore, the masterplanning work has confirmed that both surface water and foul water can be drained in a suitable manner. The site is, therefore, likely to have a negligible impact on this SA objective.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	-	0	We are of the opinion that the site would ensure the recycling of waste close to source and therefore development is likely to have a negligible impact on this SA objective.
18. Increase efficiency in water, energy and raw material use.	0	0	It is agreed that in relation to this issue, the site will have a negligible effect on the SA objective.
19. Reduce the contribution that the district makes to climate change.	++	++	It is agreed that the site is well connected by sustainable transport links and therefore levels of car use are likely to be lower.

Key	
++	The option is likely to have a significant positive impact on the SA objective(s).
+	The option is likely to have a positive impact on the SA objective(s).
0	The option is likely to have negligible or no impact on the SA objective(s).
-	The option is likely to have a negative impact on the SA objective(s).
--	The option is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect of the option will have on the SA objective(s), due to a lack of data.
+/-	The option is likely to have a mixture of positive and negative impacts on the SA objective(s).

3.3 In summary, we would maintain that the Roberttown Road site scores well within the Sustainability Appraisal prepared by the Council and the further level of technical detail we have produced and referred to in this section clarifies and provides more certainty which elevates its position in the overall rankings as well as give the necessary degree of confidence that the site in overall terms is both suitable and deliverable and should come forward as a housing allocation within the draft Local Plan. We would maintain that to deliver the fully objectively assessed housing need for the area based on the spatial distribution proposed within the draft Local Plan then developing on the most sustainable and unconstrained sites will be a necessity.

SHLAA Delivery Review

3.4 In addition to the SA score, the site has been graded in the context of the SHLAA 2014 study against suitability/availability and achievability. The site is identified as Reference 812 and the conclusions of the SHLAA assessment are as follows:

- **Suitable:** Amber – potential contamination in the north of the site and overhead power lines cross the site.
- **Available:** Green – owners support development.
- **Achievable:** Amber – costs should be offset for a site of this size.

3.5 The phasing matrix of the SHLAA 2014 study shows the site as falling within 0-5 years and also 6-10 years.

3.6 Based on our detailed masterplan work already undertaken we have reviewed this assessment and our revised approach to these criteria are as follows:

- **Suitable:** Green - Whilst there are overhead power lines that cross the site, the detailed masterplanning work we have undertaken ensures that there is sufficient standoff distance to deal with this constraint whilst creating ensuring an acceptable net developable area. Whilst we have yet to undertake a land contamination assessment, we are unaware of any potential contaminated land but we consider this to be of very low risk in any event given the greenfield character of the site.
- **Availability:** Green - As Strata Homes have entered into a land option arrangement with the landowner to promote the site for housing, the site is immediately available.
- **Achievable:** Green - Strata Homes have undertaken some initial high level viability assessment work based on the proposed land uses identified within the masterplanning work. They are not aware of any abnormal costs that are associated with site preparation. It is also our view that the broad market area and local market conditions are strong which makes the site an attractive location for housing as borne out by the promotion of this site by a housebuilder.

3.7 Based on our revised assessment of the SHLAA criteria, the site analysis would be 'green' for suitability, availability and achievability. This is further evidenced to demonstrate that the site would be deliverable in the short term i.e. within five years and would therefore be able to make an immediate contribution to the Council's housing need which is an important consideration.

Green Belt Review

3.8 We have also re-examined the site in the context of the Green Belt Review and the two tests that the Council have undertaken. It would seem from Paragraph 3.2 of the Green Belt Review that the favoured approach is to review the Green Belt edge and the land immediately adjacent to it. However, from the associated plans, the focus is associated more with the Green Belt edge and it becomes unclear from the assessment as to how much consideration has been given to the adjoining land parcels. We consider this approach is a weakness in the assessment. Specifically the test does not attempt to establish where new Green Belt boundaries could be defined. However, Paragraph 83 of the Framework confirms that Green Belt boundaries can be altered through the preparation or review of the Local Plan and at that time, Local Authorities should consider the Green Belt boundary having regard to their intended permanence in the long term so that they could be capable of enduring beyond the Plan Period. Whilst the Green Belt edges provide a useful starting point, 'general areas' or parcels and their potential revised boundaries beyond existing boundaries should be tested. Another criticism is the clear separation between the Green Belt Review and the SHLAA process. We consider that this process needs to align more closely particularly as a key reason for the review of Green Belt is based upon accommodating future housing need.

3.9 Our landscape consultants undertook an initial Landscape and Green Belt Assessment in 2014 for site H442 and have undertaken further assessment work as part of the 2015 draft Local Plan and they reached the following conclusions.

- In terms of the site's contribution to the landscape character, the site is influenced by a high degree of containment from adjacent urban features. The edge is considered to be strongly urban rather than the transitional character expected in the urban fringe. Views are limited by existing development and topography. Whilst there is a moderate landscape structure, there are relatively few rural features such as hedgerows and mature trees.
- The settlements of Roberttown, Liversedge and Norristhorpe have already merged as a consequence of ribbon development along Roberttown Lane and the A62.

- There is a high degree of containment as a consequence of a strong urban edge and road network. Furthermore, the cricket pitch to the south is also further separated from the rest of the site by landform and vegetation. Existing housing along Roberttown already separates the parcel of land from the adjacent more sensitive Green Belt parcel to the north.
- Insofar as safeguarding the Countryside from encroachment we consider that there is significant urban influences within the site and the prominence of existing housing surrounding it diminishes its relationship to the wider Countryside setting.

3.10 Appendix 1 contains an extract from the Green Belt Review for site H442 prepared by Smeeden Foreman dated January 2016 which provides a Site Analysis and a review of the Green Belt edge having regard to the Council's evidence base. We note that the assessment of the Green Belt edge within the Council's Green Belt Review has not changed from the previous evidence based work conducted in 2015. As such the evidence provided by Smeeden Foreman remain valid in terms of our position.

3.11 In our previous representations to the draft Local Plan (2015) we proposed that the revised Green Belt boundary should relate to the rear boundaries of the existing ribbon development that is situated on the north side of Roberttown Lane. As such, the Roberttown Lane site, the properties to the north of Roberttown Lane together with the Cricket Ground would be excluded from Green Belt control. To protect the Cricket Ground from any development pressures we proposed there would be the option of identifying this recreation facility as Urban Greenspace.

3.12 From the Accepted Sites Options – Technical Appraisals (November 2016) it is noted that the Green Belt issue is considered against other technical considerations. Whilst the strategic role of Site H442 in Green Belt terms is not strong as Roberttown and Liversedge are already merged to some extent south of the site. The underlying assessment of the Council is that **'this is a well contained site bounded by the existing settlement, Roberttown Lane and the Cricket Ground and so there is no risk of sprawl'**.

- 3.13 We would agree with this overall conclusion. Given the limited material contribution the site makes to the purposes of Green Belt the Council have then considered whether there are exceptional circumstances for amending the Green Belt boundary in this particular case. The Council confirmed that the site is required to meet the objectively assessed housing need in the district and following consideration of all relevant none Green Belt alternatives such as: the need to promote sustainable development patterns; the role and function of Green Belt; and the specific characteristics of site H442 they deemed that the benefits of facilitating housing outweigh the loss of this part of the Green Belt. We strongly support the conclusion that has been reached and welcome the proposal to remove the site from Green Belt and its inclusion as a housing allocation.
- 3.14 It is noted in the Green Belt - Boundary Changes document that both site H442 and the Liversedge Cricket Club are proposed to be removed from Green Belt and therefore a revised Green Belt boundary would follow Roberttown Lane. Whilst we have previously suggested that the properties north of Roberttown Lane should also be excluded from Green Belt control as well we appreciate that the revised boundary proposed by the Council also provides a physical and defensible boundary that could be considered to endure beyond the plan period and so this is supported.

Technical Appraisal

- 3.15 It is noted from the Technical Appraisal Assessment (November 2016) that the Council have undertaken a review of important technical and infrastructure requirements associated with proposed allocated sites including Site H442. The responses received from the Council's technical officers is consistent with the more detailed evidence we have undertaken and found within a Development Framework Report (October 2014) we have prepared.

3.16 Within the draft Site Allocation Policy Document there is specific reference to the following reports being required for the site:

- Transport Assessment and Travel Plan
- Air Quality Impact Assessment
- Contamination Report (Phase I and Phase II)
- Coal Mining Risk Assessment
- Flood Risk Assessment
- Heritage Impact Assessment

3.17 All these seem reasonable as part of the preparation of a detailed planning application, however the information that has been captured to date confirms that appropriate mitigation measures can be introduced to address and overcome specific key technical matters as part of the planning application process.

3.18 In terms of infrastructure provision it is noted that there is no immediate need for primary school places and the same is currently true in relation to secondary school provision. This evidence will need to be considered in the context of both the CIL Charging Schedule and planning obligations to justify any reasonable contribution to education facilities.

3.19 In terms of contributions towards openspace or recreational facilities is concerned we would envisage on site openspace provision as required by the Local Plan policies but there should also be the opportunity to make a financial contribution in lieu of on-site provision in certain circumstances. Finally we note that in terms of public health the site is within a Ward that does not have significant concerns relating to health indicators and therefore we anticipate that no contribution will be required.

3.20 In conclusion it is our view that there are no significant technical issues that require to be overcome in order to ensure that the suitability and deliverability of site H442 having regard to both the Council's evidence based assessment work and in some areas our own more detailed analysis. We therefore fully support the Council's approach of removing site H442 from Green Belt and its proposal as a housing allocation given the planning benefits that can be achieved.

4.0 Assessment of Housing Need and Supply

- 4.1 In terms of our assessment of housing need, we previously made representations to the 2015 draft Local Plan and criticised the Council's target of 1,630 dwellings per year as being too low for two specific reasons with these being as follows:
- It represented an underestimate of internal migration patterns;
 - It did not reflect the economic aspirations of the Council expressed in the Local Plan and the Kirklees Economic Strategy.
- 4.2 We note from the Council's Statement of Pre-Submission Consultation that these two points are acknowledged and proposed changes are identified commenting that the demographic information has now been updated to reflect the latest assumptions set out in the 2014 Base Household Projections and that economic assessments have also been revised.
- 4.3 We note that the Council have commissioned a further Strategic Housing Market Assessment dated October 2016 which provides the latest available evidence to help shape the housing policies for the Local Plan and it supersedes the 2015 SHMA. Having considered the evidence it is now proposed in the Draft Publication Local Plan that the objectively assessed housing need in Kirklees for the period 2013 – 2031 is 1,730 and this takes into account the 2014 Based Household Projections as well as the need to deliver additional dwellings to support jobs growth.
- 4.4 Based on our previous assessment and representations we proposed a range of between 1,730 – 1,800 dwellings per annum and therefore we support the Council's revised target albeit it is still at the bottom end of the range we previously suggested.
- 4.5 Table 5 entitled Meeting the Housing Requirement identifies a 10% lapse rate to planning permissions which are not Local Plan allocations. The inclusion of a lapse rate is supported and accords with our comments made upon the previous version of the Local Plan.
- 4.6 The plan still relies heavily upon windfalls at 450 dwellings per annum from 2020. During the period 2020 to 2031 the provision of 4,950 windfall dwellings represents over 15% of the minimum net housing requirement. To deliver this level of windfall will have implications for the delivery of the plan.
- 4.7 It is our view that the effect of having an up-to-date plan with allocations and a more robust and fine grain evidence base through the SHLAA process provides a justification to move away from past trends.

- 4.8 Paragraph 48 of the Framework requires an assessment of where the windfalls will continue to provide a reliable source of supply in the future. This assessment is currently lacking from the 2016 Housing Technical Paper and the 2014 SHLAA. More specifically, whilst it would appear appropriate to include a small site allowance as these are not captured by the SHLAA, larger sites are likely to be reduced significantly. It is therefore recommended that further analysis is undertaken of sources of windfall supply and consideration given to the likely delivery over the planned period.
- 4.9 From Table 5, a figure of 21,324 dwellings over the plan period is identified as land to be allocated in the Local Plan. This in our view is a minimum figure and it does not provide a realistic buffer of potential sources of housing supply to ensure that the housing requirement is met in full. In order for the plan to be flexible and deal with changing circumstances we consider that the principle of a buffer should be considered. This is particularly important as Kirklees has a recent track record of under delivery against housing target. The recent LPEG report recommends a 20% buffer of reserved sites be provided to ensure that the plan can maintain a five year housing supply and respond flexibly and rapidly to change. This approach should be given careful consideration by the Council.

5.0 Representations to Other Relevant Policies

- 5.1 This section comments specifically on the relevant policies in the Strategy and Policies Draft Local Plan in relation to promoting the site H442 at Roberttown.

Policy PLP1 – Presumption in Favour of Sustainable Development

- 5.2 This policy reconfirms the guidance found within the Framework and the positive tone of this Policy is supported, particularly the objective of seeking to work proactively with applicants and secure development that improves the economic, social and environmental conditions of the area.

Policy PLP2 – Place Shaping

- 5.3 For each of the four sub areas in the Local Plan, this Policy seeks to encourage development proposals to build on their strengths, opportunities and help address challenges.
- 5.4 Section 5.9 is entitled Batley and Spen and it recognises that although the built up areas of Heckmondwike, Batley and Dewsbury have emerged into one urban area, many settlements are separated by only relatively narrow areas of Green Belt. These narrow areas of Green Belt are identified on Figure 5 and it is interesting to note that in so far as the Roberttown site (H442) is concerned, there is no recognition that a narrow Green Belt boundary exists between the settlement of Roberttown and Heckmondwike. From the Council's assessment we would conclude that there is a clear assumption that the settlement of Roberttown has already merged with the urban area of Heckmondwike and so its sensitivity is less than other areas that have been recognised as having narrow Green Belt gaps between settlements.

Policy PLP3 – Location of New Development

- 5.5 This Policy seeks to deliver planned growth favouring the larger settlements but we consider the Settlement Appraisal and the range and types of facilities should also be a key factor in deciding where new development is focused. Whilst we would not encourage a prescriptive percentage distribution of the housing need between specific settlements, we equally think that the proposed general distribution between the four sub areas is too vague and imprecise. To ensure a suitable framework the draft Local Plan should identify those settlements that are of a size, function and character that can achieve the delivery of housing and employment growth in a sustainable manner. As part of this process, we would promote the settlement of Roberttown as a place which could accommodate further development opportunities.

Policy PLP4 – Providing Infrastructure

- 5.6 This policy confirms that the Council will work with partners to bring forward the necessary and proportionate essential infrastructure that is required. As Paragraph 6.16 confirms, the NPPF states that the Local Plan should not include such a scale of obligations and policy burdens that the viability of development is threatened. It is therefore important to ensure that contributions and potential CIL rates on development viability is sensible and realistic. Provided that the Policy only requires improvements to infrastructure capacity to cater for the additional needs the development generates then we do not object to the approach advocated by the Council.

Policy PLP5 – Masterplanning Sites

- 5.7 It is assumed that this Policy will relate to sites over a certain threshold but it is unclear from the current wording.
- 5.8 The masterplan criteria is very extensive and we are of the opinion that the work we have already undertaken in terms of promoting the Roberttown site already fulfils many of the expectations of this Policy.

Policy PLP6 – Safeguarded Land (land to be Safeguarded for Potential Future Development)

- 5.9 The NPPF at Paragraph 85 identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs 'well beyond the Plan period' and that Local Authorities should satisfy themselves that Green Belt boundaries 'will not need to be altered' at the end of the Plan Period. There is an assumption that where it is justified to amend Green Belt boundaries as part of the Local Plan process, the new Green Belt boundary should not require altering at the end of the Plan Period.
- 5.10 Whilst we support the principle of safeguarded land, the Policy wording and justification does not fully address the issue. Further work is required to provide justification as to the amount of safeguarded land that should be reserved to accommodate potential future housing and employment requirements beyond the Plan period. It is accepted that change to the safeguarded land allocations would only occur through a review of this Local Plan. Nevertheless, it is recommended that a clear rationale for identifying safeguarded land and an appropriate time arising beyond the Plan Period is required. This would afford longevity to the Green Belt and satisfy paragraph 83 of the Framework which confirms that once established Green Belt boundaries should be '.....capable of enduring beyond the Plan Period'.

- 5.11 The previous draft Local Plan suggested as an alternative the possibility of allowing some safeguarded land to be brought forward within the Plan Period as a contingency if allocated sites do not deliver sufficient development. This option has been dismissed by the Council but we consider it is a sensible approach to adopt particularly as the plan should be sufficiently flexible to meet changing and unforeseen circumstances. It is accepted that the identification of site allocations through the Local Plan process should ensure both suitable and deliverable sites that will come forward during the Plan Period but based on the historic under-delivery rates and the requirements to boost housing supply having contingency measures would be appropriate. With the introduction of regular monitoring and key indicators to determine whether or not the plan is delivering against the requirement this would ensure that measures are put in place to identify the circumstances that could therefore lead to the release of contingency sites. Such measures could be the failure of the Council to maintain a five year supply of deliverable housing sites.

Policy PLP11 - Housing Mix and Affordable Housing

- 5.12 We support the need to deliver a mix of housing and agree that this should take account of the SHMA. The figures within the SHMA should however be viewed as indicative targets only and not detailed prescriptions for all schemes of 10 units or more. This is because the SHMA only provides a snapshot in time and the needs will vary both geographically and over time therefore rigid requirements will not be appropriate, particularly in a diverse district such as Kirklees. Furthermore, issues such as viability, site characteristics and market demands should also be taken into account to ensure delivery of the overall housing requirement is achieved.
- 5.13 The Council should also have regard to its own aspirations for economic growth. The achievement of growth will be reliant upon attracting a range of investors to locate in Kirklees. Part of this investment will be based on the housing offer available in the plan. To attract such investment there is likely to be a need for an element of aspirational housing. This will also help to ensure working families are retained within the area and not lost to other areas.
- 5.14 It is important that the Council set a clear threshold and target which has a sound evidence base in terms of justifying the overall viability of the Local Plan. Evidence would suggest from the Council CIL Study that a large proportion of the district would generate values that would be unviable if a 20% affordable housing requirement was imposed – we therefore request that the 20% affordable housing figure is re-examined and a lower percentage figure should be identified.
- 5.15 In response to the Starter Home initiative that is now being promoted by the Government, the Policy should be amended to consider the implication of these emerging changes.

6.0 Community Infrastructure Levy – Draft Charging Schedule

- 6.1 We are concerned that any Community Infrastructure Levy does not put at risk the development viability of the Roberttown site (H442).
- 6.2 We note that the district has been split into four Charging Zones for residential purposes of ten or more dwellings. It would seem from the Appendix A Draft Charging Rates Map that the Roberttown site falls within Zone 3 and the charging rate value for this area is £5 per sq m.
- 6.3 Reference is made to the CIL Viability Addendum prepared by Cushman Wakefield dated September 2016 and it would seem that the adjusted value areas identified in Figure 2.2 have been transferred across into the draft Charging Schedule. Within the adjusted value area Site H442 is identified as 'Value Area 4'. From Table 3.3, which provides a comparison of CIL headroom between October 2015 and the revised assessment, Value Area 4 (for sites of ten units plus) was identified as having a maximum CIL headroom (October 2015) of zero and with the amendments identified in May 2016 the same value area was also shown as zero. Nevertheless, the Preliminary Draft Charging Schedule shows a rate of £5 per sq m. It is clear that based on evidence work and land values associated with Value Area 4 there are viability concerns which would suggest that a nil rate of CIL is recommended for residential schemes of over ten dwellings within this area. We therefore recommend that the draft Charging Schedule for Zone 3 is reduced to a nil rate of CIL.
- 6.4 Appendix D of the draft Charging Schedule provides a CIL draft Regulation 123 List. Table 2 sets out the infrastructure provision but it is at a high level. It would be helpful if the Council could provide a more detailed Regulation 123 List of specific projects that are to be funded by the CIL. There is insufficient clarity from the evidence submitted by the Council in terms of what items of infrastructure are intended to be covered by CIL and/or by a Section 106 Agreement. This is particularly the case with respect to education, highway improvements and openspace. We are concerned that without further clarity there may be an element of 'double dipping' between the Regulation 123 List and any Section 106 Agreement.

7.0 Conclusions

- 7.1 This is a formal response to the Kirklees Local Plan – Strategy and Policies submitted on behalf of Strata Homes (Yorkshire) Limited specifically in relation to the promotion of a site known as 'Land to the South of Richmond Park Avenue, Roberttown' with Reference Number H442 in the Local Plan evidence base work.
- 7.2 We strongly support the Council decision to allocate this site for housing purposes and these representations have focused on those aspects of the policies and proposals that seek to justify the housing allocation.
- 7.3 We consider that in principle the Local Plan meets the Government's key test of soundness set out in the Framework having regard to the key tests identified in Paragraph 182. However there are specific policies that require refinement and modification so that they are consistent with Government guidance.
- 7.4 In our representations we have demonstrated that Strata Homes are fully committed to promoting and delivering the Roberttown site. The comprehensive assessment work we have undertaken to date provides strong evidence to demonstrate the suitability and deliverability of the site coming forward in the short term to support the required level of growth for the district.
- 7.5 The masterplan process we have already undertaken and submitted to your Authority in October 2014 entitled 'Development Framework Report' has demonstrated that the site performs well in sustainability terms and there are no major constraints associated with facilitating the scale and mix of approximately 250 dwellings. Using our evidence base work and applying this to the Council's Sustainability Appraisal (in particular the SA objectives) we have challenged some of the scores/grading which lead to a stronger sustainability performance than currently reflected with the SA.
- 7.6 By commissioning landscape consultants, Smeeden Foreman to review the Local Authority's Green Belt evidence base work and apply this to the Rotherham Site, we have demonstrated that the site makes no material contribution to the Green Belt in terms of preventing settlements from merging, checking unrestricted urban sprawl and safeguarding the Countryside from encroachment as the site is considered disconnected from the surrounding areas of countryside. The Smeeden Foreman Green Belt Analysis Plan provides a proposed revised Green Belt boundary that would not only allow the release of the Roberttown Site for housing but also provide a strong physical feature to act as a defensible boundary in accordance with the Framework.

- 7.7 Based on our assessment of housing need over the period 2013 to 2031, we have studied the Council's evidence base and we are of the view that the 'objectively assessed' housing need figure of 1,750 dwellings per year reflects the economic aspirations of the Council that are expressed either within the Local Plan and the Kirklees Economic Strategy although this is at the lower end of the range we previously recommended. The housing need has also been re-evaluated to more accurately reflect the migration patterns. Both migration and fulfilling the Council's economic aspirations will lead to an increase in the housing need figure. We have calculated that the minimum dwelling requirement should be at least 1,750 dwellings per year over the Plan period.
- 7.8 From our assessment of the different forms of housing supply, we consider the Council have overestimated the anticipated delivery from the windfall allowance. Furthermore, to create a wide choice and range of housing sites that are available, we consider that the 'flexibility buffer' is introduced. The LPEG report recommends a 20% buffer. This would reflect the persistent record of un-delivery of housing within Kirklees as well as the ability of the district to boost the delivery of housing as quickly as possible and respond rapidly to change.
- 7.9 We have made specific representations to other relevant policies within the draft Local Plan that relate directly and indirectly to the promotion of the Roberttown Site for housing purposes.
- 7.10 Finally we have assessed the draft CIL Charging Schedule and based on the viability evidence work prepared by Cushman Wakefield the charging rate for more than 10 units in Zone 3 should be nil rather than the proposed level of £5 per m. Also there should be more clarity of what items of infrastructure are intended to be covered by CIL within the Regulation 123 list.
- 7.11 We trust you will give careful consideration to the representations we have submitted and we would like to be kept informed of future consultation stages.

Site Analysis

The parcel of land is located between the settlements of Roberttown, to the south west, Norristhorpe to the east, and Liversedge, to the north. Liversedge Cricket Club occupies the south western corner of the site, leaving the rest as grazed agricultural land. The parcel of land is considered to have a high degree of containment from all aspects by urban features.

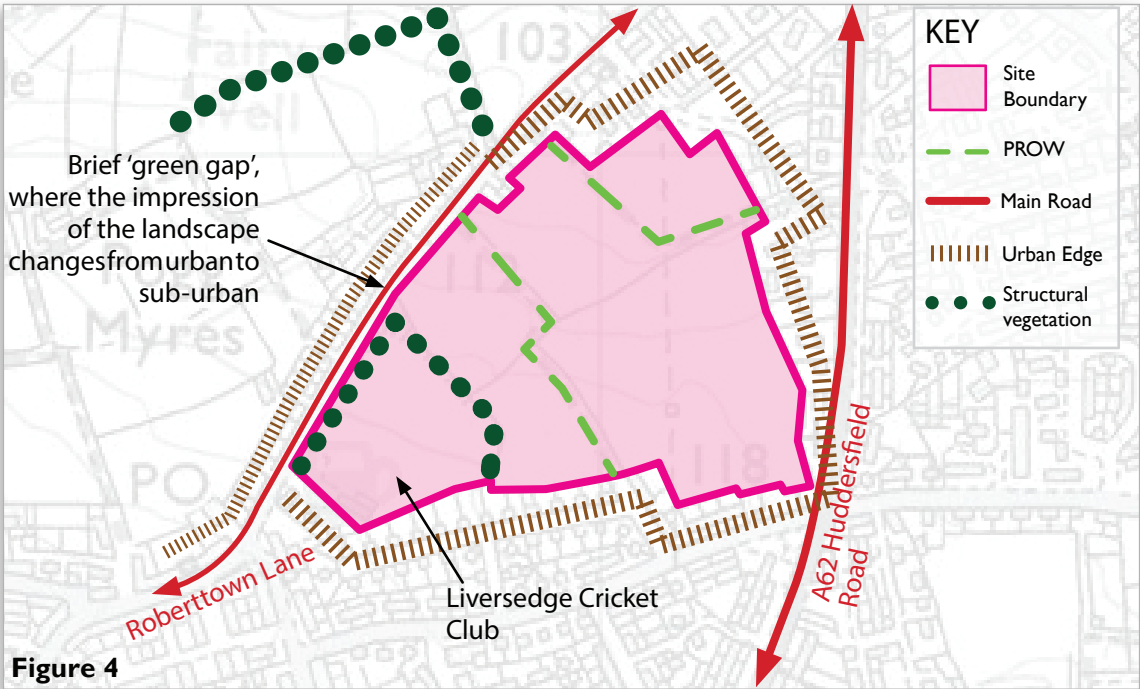
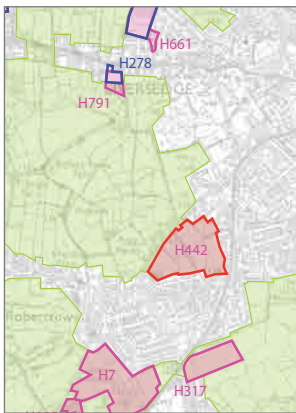


Image 2

LANDSCAPE VALUE		GREEN BELT PURPOSES	
Contribution to landscape character	Prevents merging	Checks unrestricted sprawl	Safeguards from encroachment
The character within the site is influenced by as a high degree of containment from adjacent urban features. The edge is considered to be strongly urban rather than the transitional character expected at the urban fringe. Views are limited by development and topography. There is a moderate landscape structure, however rural features, such as hedgerows and mature trees, are few.	The settlements of Roberttown, Liversedge and Norristhorpe have already merged as a consequence of Ribbon Development along Roberttown Lane and the A62. The coalescence between the settlements is evident when the site is viewed from the north and when travelling along the A62. There is a brief perception of seperation as a result of a 'green gap' when travelling south along Roberttown Lane.	There is a high degree of containment as a consequence of a strong urban edge and road network. The cricket pitch to the south is also further seperated from the rest of the site by landform and vegetation. Housing along Roberttown Lane seperates the parcel of land from the adjacent Green Belt parcel.	There are significant urban influences within this site and existing housing surrounding the site deminishes the relationship to the wider countryside. The site contains land used for recreation and two PROW disect the site.

Viewpoints

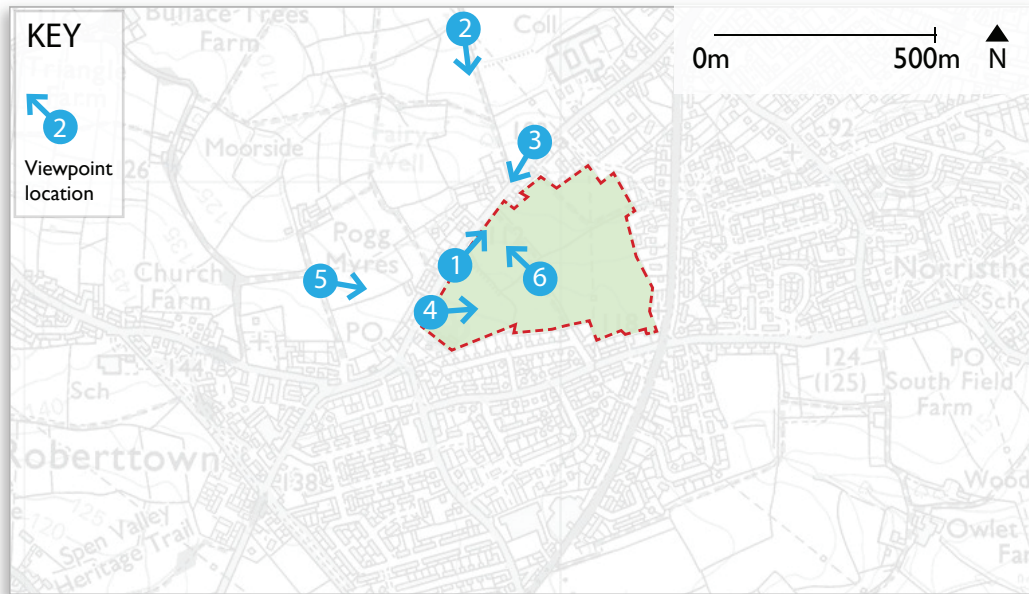


Figure 5: Map of viewpoints

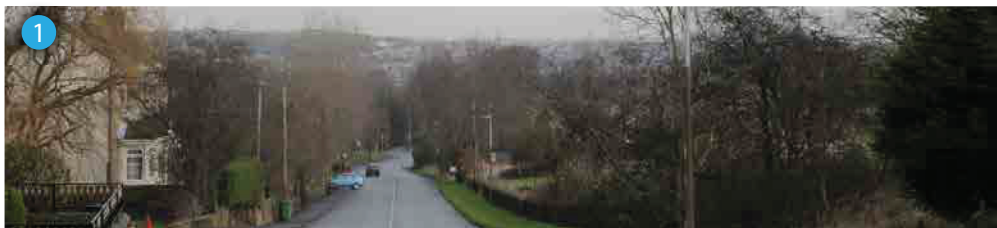


Image 3: View north east along Roberttown Lane and 'green gap'



Image 4: View north from Public Right of Way



Image 5: View south from Roberttown Lane



Image 6: View across Site H442 from the Cricket Club



Image 7: Rear of houses along Roberttown Lane

Green Belt Edge Review

Outcomes from the Kirklees Green Belt Edge Review

Test 2a - Prevents merging

'Restricted gap to Liversedge. Settlements appear joined on Leeds Road'

Analysis from viewpoints demonstrate that Roberttown and Liversedge have already physically merged and the perception of separation has diminished when viewed from the north (Viewpoints 2 and 5) and from within the parcel of land (Image 8). The 'edge' shown in Figure 6 opposite is considered ineffective at retaining the separation of settlements.

Test 2b - Checks sprawl

'Development fronting Roberttown Lane provides containment.'

It is considered that housing on Roberttown Lane would provide a stronger more defensible boundary to the Green Belt. A suggested boundary to the Green Belt in this area is shown overleaf on page 14.

Test 2c - Safeguards from encroachment

'Development on rising ground could be prominent when viewed from the north.'

Viewpoints 2 and 5 illustrate the extent to which the parcel of land is obscured by intervening vegetation, built form and landform. Analysis of the local landscape character reveals that existing development pattern has been restricted to higher ground, leaving pockets of recessed 'countryside' between settlements.

Test 2d - Preserves setting and character

'No impact'

This study did not identify a significant impact on setting or character if this site was to be developed.

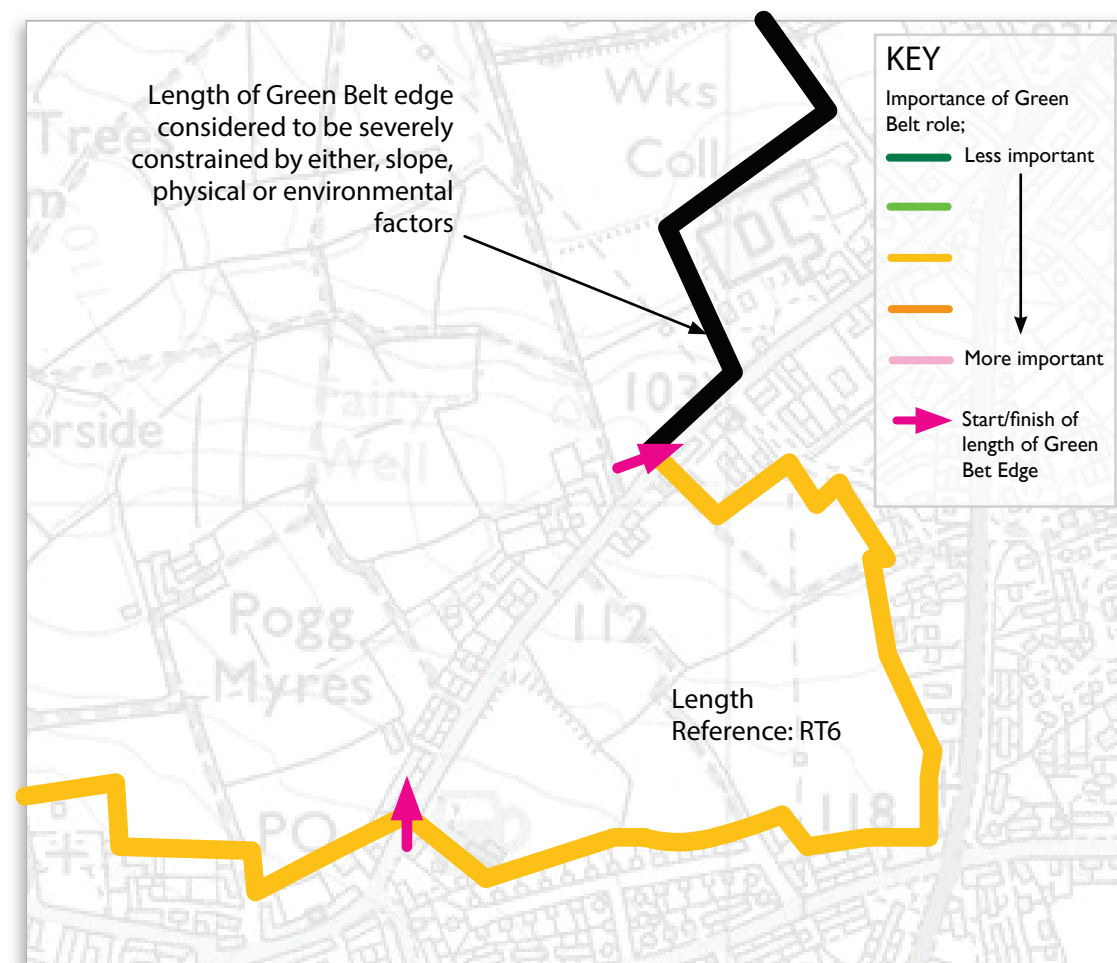


Figure 6: Reproduction of Green Belt Edge Review Outcomes Map for the length affecting H442



Image 8: Housing fronting Roberttown Lane

Green Belt Edge to Roberttown Lane

Outcomes from the Kirklees Green Belt Edge Review [3]

Conclusions for edge LVI:

‘Severely constrained’ from **‘Playing fields for Spen Valley High School’**. (Marked ‘black’)

Conclusions for RT8;

‘Development up to Bullace Trees Lane would be extensive relative to the size of the settlement. Field pattern provides few opportunities that would be well related to the existing settlement form.’ (Marked ‘dark yellow’)

Conclusions for RT7;

‘Development south of Bullace Trees track could have limited impact on openness but this would be greater than development of RT6.’ (RT6 as shown on Figure 6). (Marked ‘light yellow’)

Proposal for adjusted edge RT6:

Using the same methodology as the Kirklees Green Belt Review and Outcomes, the proposed adjustment of RT6 has been marked as ‘light yellow’ for the following reasons;

- The edge does not have any significant topographical, physical or environmental constraints. **(None/Minor)**
- The edge does not prevent merging of settlements. **(Extensive gap)**
- Field boundaries and woodland to the north provide some containment. **(Moderate)**
- Development to the rear of houses fronting Roberttown Lane could be prominent when viewed from the west (see Image 7) and is not considered consistent with existing development pattern. The land to the north of Roberttown Lane has a high density of Public Rights of Way. **(Important)**

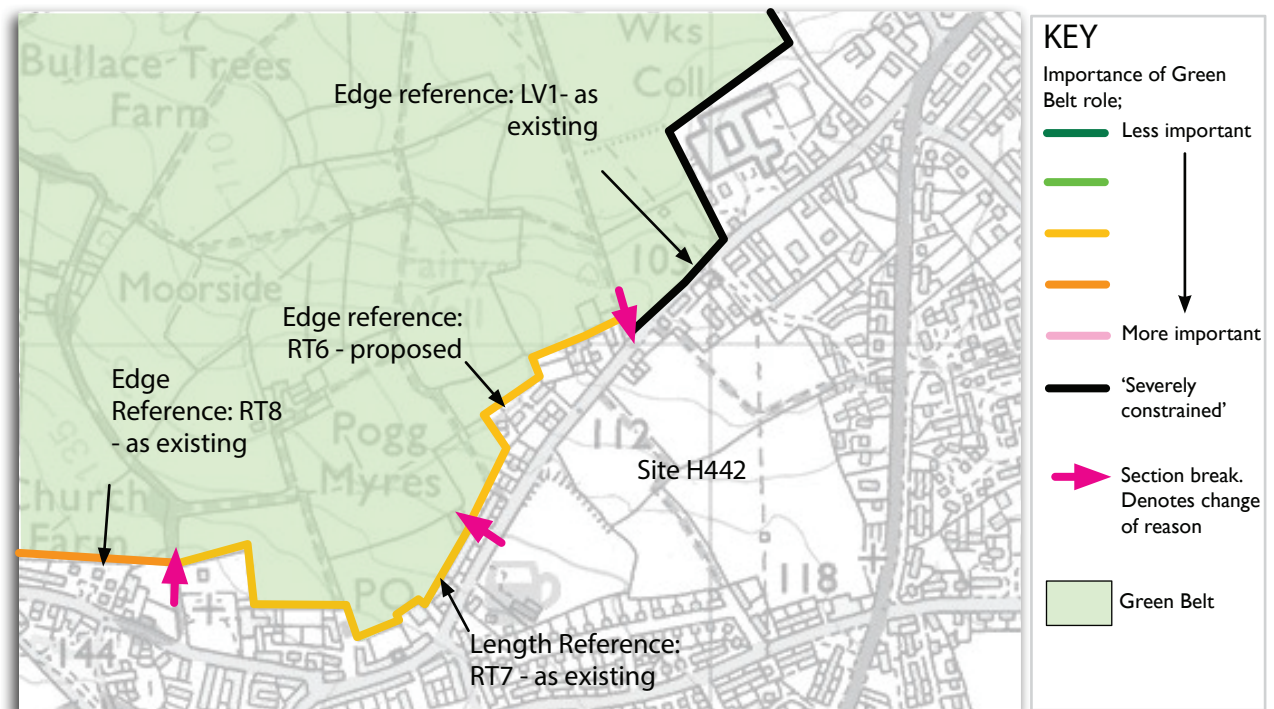


Figure 7: Proposal for changes to Green Belt Edge, RT6

Justification

Figure 7 (above) shows the proposed changes to the Green Belt edge, RT6. The proposals redefine the boundary to the rear of housing fronting Roberttown Lane. This new boundary follows an urban edge distinctly different from the adjacent land parcels to the north and continues the existing development pattern. The links between Site H442 and the Green Belt to the north have been severed by the road and housing, and subsequently prevents this land contributing to the wider Green Belt area. This boundary allows the release of land which would facilitate its re-use, while making a more distinct and defensible boundary to the retained Green Belt.