

# **Kirklees Local Plan Submission Documents SD7**

Kirklees Local Plan:  
Publication Draft Sustainability  
Appraisal Report –  
Addendum Notice  
(April 2017)





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# Kirklees Local Plan Sustainability Appraisal

## Addendum to the Publication SA Report

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April 2017

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# 1 Introduction

- 1.1 This Sustainability Appraisal Addendum has been prepared by LUC on behalf of Kirklees Council as part of the integrated Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Kirklees Local Plan.
- 1.2 This SA Addendum should be read in conjunction with the full SA Report published in October 2016 for the Kirklees Publication Draft Local Plan (November 2016) and the SA Erratum Notice (November 2016).
- 1.3 The purpose of this SA Addendum is four-fold:
  - To respond to one of the statutory environmental consultees' (Historic England) comments on the October 2016 SA Report.
  - To present the SA matrix and findings for one safeguarded land option (SL2273) that inadvertently was omitted from Annex 1 of the October 2016 SA Report.
  - To present the updated SA findings for residential site H138, as consultee comments in response to the October 2016 SA Report brought to our attention that there is a playing pitch present on the site.
  - To present the updated SA findings for residential site H2730a, as consultee comments in response to the October 2016 SA Report brought to our attention that there was an error in the description of development surrounding the site.
- 1.4 The SA Addendum is therefore structured in relation to the four issues listed above, with **Section 2** responding to Historic England's response, **Section 3** summarising the findings for the omitted residential site option, **Section 4** presenting the amended findings for site H138 and **Section 5** presenting the amended findings for site H2730a. The previously omitted SA matrix for the safeguarded land option is presented in **Appendix 1**.

## 2 Historic England Representation

- 2.1 Historic England's representation to the Regulation 19 consultation on the Publication Draft Kirklees Local Plan (November 2016) and October 2016 SA Report raised concerns that while Historic England broadly agreed with the conclusions in the SA Report regarding the likely significant effects of the Local Plan Policies and mitigation measures suggested, the SA had not adequately assessed the likely significant effects which the site allocations in the Local Plan might have upon the historic environment nor had it put forward appropriate mitigation measures to remove or reduce any harm to an acceptable level.
- 2.2 In particular, Historic England's representation is concerned about the sites that were found to have an "uncertain" effect against SA Objective 13 (Conserve and enhance this historic environment, heritage assets and their settings), and states that *"at the very least we would have expected to see a recommendation for each of these sites that a more detailed evaluation of the potential impact which the development of these sites might have upon the historic environment is undertaken before the site is identified as an Allocation"*.

### Approach taken in the October 2016 SA Report

- 2.3 As explained in **Chapter 2** and **Appendix 3** of the October 2016 SA Report, in order to ensure consistency in the appraisal of a large number of site options, detailed sets of assumptions were developed and applied for each type of site (e.g. residential, employment, mixed use, open space, Traveller, minerals and waste sites). For predicting the effects on the historic environment, the SA assumptions used by LUC drew directly from the colour-coded ratings for each site option that were provided to the Council by Historic England.
- 2.4 Historic England's ratings are referred to in the SA assumptions tables in Appendix 4 against SA Objective 13, and were translated into predicted sustainability effects as also described in Appendix 4 of the SA Report and repeated below:

"Historic England (formerly English Heritage) has been consulted on the list of site options being considered for allocation in the Kirklees Local Plan and has rated each site as either red, orange, yellow or green based on the likely effects on the historic environment of developing the site in question:

- **Red** - The development of the site is likely to result in substantial harm to a designated heritage asset.
- **Orange** - The impact of the development of these sites on the historic environment is uncertain.
- **Yellow**- The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.
- **Green** - The development of the site is unlikely to result in harm to any designated heritage asset."

- 2.5 In turn, the potential sustainability effects were described in Appendix 4 as:
- *"Sites that are rated red by Historic England could have a significant negative (--?) effect.*
  - *Sites that are rated yellow by Historic England could have a minor negative (-?) effect.*
  - *Sites that are rated green by Historic England could have a negligible (0?) effect.*
  - *Sites that are rated orange by Historic England would have an uncertain (?) effect."*
- 2.6 The SA assumptions table also noted that *"In all cases, potential effects are uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities which may exist to enhance the setting of heritage*

features (e.g. where sympathetic development replaces a derelict brownfield site which is currently having an adverse effect)."

2.7 **Chapter 4** in the October 2016 SA Report explained the findings of the residential site options for SA Objective 13. This is summarised in **Table 2.1** below.

**Table 2.1 SA findings for SA objective 13 in accordance with Historic England ratings**

Historic England rating	Effect recorded in SA	Number of sites	% of sites
<b>Red</b> (substantial harm)	Potential significant negative effects (--?)	5	0.5
<b>Yellow</b> (potential damage but likely to be mitigated by Local Plan policies)	Potential minor negative effects (-?)	28	3
<b>Orange</b> (uncertain)	Uncertain (?)	335	34
<b>Green</b> (harm unlikely)	Likely negligible effects (0?)	614	63
<b>Total</b>		982	100.5*

\* higher than 100% due to rounding.

2.8 **Chapter 5** in the October 2016 SA Report summarised the findings of the employment site options for SA objective 13, which were that:

- None of the employment site options were rated by Historic England as 'red' on the basis that the development of the site is likely to result in substantial harm to a designated heritage asset. Therefore, no likely significant negative effects on this SA objective were identified.
- Ten (9%) of the employment site options could have a minor negative effect as they were assessed by Historic England as 'yellow'.
- A further 26 (24%) of the site options were identified as having uncertain effects on SA objective 13 as they were classified by Historic England as 'orange' because their likely effects on the historic environment are uncertain.
- The remaining 72 (67%) sites were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those 72 sites are therefore most likely to have a negligible effect on this SA objective, although this is again uncertain.

2.9 **Chapter 6** in the October 2016 SA Report summarised the findings of the mixed use site options for SA objective 13, which were that:

- None of the mixed use site options were rated by Historic England as 'red', meaning that the development of the site would be likely to result in substantial harm to a designated heritage asset. Therefore, no likely significant negative effects were identified for any of the site options.
- Potential minor negative effects were identified for five (14%) of the mixed use site options as they were classed as 'yellow' by Historic England.
- A further nine (25%) mixed use site options were identified as 'orange' by Historic England as their likely effects on the historic environment are uncertain.
- The final 22 (61%) mixed use site options were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those sites are therefore most likely to have a negligible effect on this SA objective although this is again uncertain.

2.10 **Chapter 7** of the October 2016 SA Report summarised the findings of the open space site options for SA objective 13, which were that the designation of open space sites would be likely to have a positive effect on the setting of these assets as they would prevent further development (which may not be of a sympathetic nature with regards the existing character of the area) from occurring.

- 2.11 **Chapter 8** in the October 2016 SA Report summarised the findings of the traveller site options for SA objective 13, which were that:
- One Traveller site option (GTTS1962) was rated by Historic England as 'red' on the basis that the development of the site is likely to result in substantial harm to a designated heritage asset. The site lies within Bretton Hall, a Registered Park and Garden.
  - One other site (GTTS1964) could have a minor negative effect as it was assessed by Historic England as 'yellow'.
  - Twelve sites were identified by Historic England as 'orange' because their likely effects on the historic environment are uncertain (this is also reflected in an uncertain SA score).
  - The remaining 22 sites were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those 22 sites are therefore most likely to have a negligible effect on this SA objective although this is again uncertain depending on the detailed proposals for the sites.
- 2.12 **Chapter 9** in the October 2016 SA Report summarised the findings of the mineral site options for SA objective 13, which were that:
- None of the mineral sites were rated by Historic England as 'red', i.e. the development of the site is likely to result in substantial harm to a designated heritage asset, and as such none of the mineral sites would have a significant negative effect.
  - None of the mineral sites were classed as 'yellow' by Historic England. Therefore, none of the mineral sites would have a potential minor negative effect either.
  - Sixteen (33%) mineral site options were identified as 'orange' as their likely effects on the historic environment are uncertain.
  - Most (33 out of 49 or 67%) of the mineral site options were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those sites are therefore most likely to have a negligible effect on this SA objective although this is again uncertain.
- 2.13 **Chapter 10** in the October 2016 SA Report summarised the findings of the single waste site option for SA objective 13, which was that it was predicted to have a negligible effect because it was classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset.

### Consultation response of Historic England

- 2.14 In its consultation letter dated 25<sup>th</sup> November 2016, on the Publication Draft Kirklees Local Plan, Historic England stated that:

*"We have reservations about the approach which this SA has used to evaluate the likely significant effects which the Plan's proposals might have upon the historic environment and, as a result, would question whether or not the mitigation measures suggested (i.e. relying on the Policy framework of the plan) would actually reduce any harm to an acceptable level."*

- 2.15 The letter went on to state that:

*"For all the "orange" sites (which, if they have been carried through into the draft Local Plan as Allocations are those which we have highlighted in our response to the Allocations and Designations Document) the following work is necessary:-*

- (1) An assessment should be undertaken of the contribution which these sites make to the significance of the heritage assets in their vicinity and what impact their development might have upon the significance of these assets.*
- (2) If it is considered that the development of any site would harm elements which contribute to the significance of a nearby heritage asset, then the Plan needs to set out the measures by which that harm might be removed or reduced.*
- (3) If, at the end of the process, it is concluded that the development would still be likely to harm elements which contribute to the significance of a heritage asset, then that site should*

*not be allocated unless there are clear public benefits that outweigh the harm (as is required by NPPF, Paragraph 133 or 134)."*

### Heritage Impact Assessments undertaken for Kirklees Council

- 2.16 In response to Historic England’s concerns, Kirklees Council commissioned Heritage Impact Assessments (HIAs) to be carried out for a targeted number of allocated sites that were rated as ‘orange’ by Historic England. The HIAs were carried out by Farrell and Clark Architects LLP, and were informed by a review of historic mapping and secondary source material in addition to undertaking a site visit to each site. A report was prepared and provided to the Council for each site, which draws conclusions regarding the significance of the potential impact of development on the historic environment, and whether there are options for mitigation or enhancement.
- 2.17 The conclusions of the HIAs show that the sites where uncertain impacts were identified (rated ‘orange’ by Historic England) are generally unlikely to have significant impacts on the historic environment. Where there might be potential for significant impacts, a number of mitigation options have been suggested within the HIA reports that could be implemented through the design of development on those sites.
- 2.18 Local Plan Policy PLP35 Historic Environment includes a number of requirements to safeguard the historic environment, including a requirement that development conserves elements that contribute to the significance of any heritage assets that may be affected. In addition, the text in the site allocations boxes (reports required) requires a Heritage Impact Assessment to be submitted alongside planning applications (utilising or supplementing existing HIAs that are part of the local plan evidence base), where relevant.

### Further consultation with Historic England

- 2.19 In early February 2017, Kirklees Council met with the Historic England officer who made the representation on the Publication Draft Local Plan and SA Report and explained about the HIA work that had since been undertaken.
- 2.20 Historic England has confirmed in a subsequent letter to the Council (dated 24<sup>th</sup> February 2017) that the HIAs being undertaken by Farrell and Clark seem likely to provide the necessary degree of evaluation to inform both the Plan itself and the Sustainability Appraisal about the likely effects which each of the allocations might have upon Kirklees’ heritage assets. Historic England also noted that there may well be a need to publish an addendum to the Publication Draft Sustainability Appraisal tying the output of the Heritage Impact Assessments into the appraisal process, which is fulfilled by this document. Historic England states that, although not wishing to prejudge the conclusions and recommendations of these Appraisals or any addendum to the Sustainability Appraisal, the HIA work undertaken by the Council seems likely to address all previously-stated concerns regarding the Sustainability Appraisal.

### Update to the SA findings in the October 2016 SA Report

- 2.21 Farrell and Clark, have provided summary results of their HIAs to inform the SA addendum. For each site Farrell and Clark have assessed the contribution made by setting to the significance of nearby heritage features. This indicates the potential for development at each site to affect these features and can therefore remove some of the uncertainty previously associated with those sites rated ‘orange’ by Historic England. Farrell and Clark have given each allocated site an overall rating in terms of the potential effects of development on the historic environment. LUC has equated these ratings to those given by Historic England, as demonstrated in **Table 2.2**.

**Table 2.2 Farrell and Clark ratings and equivalent Historic England rating**

Farrell and Clark rating	Equivalent Historic England rating
<p><b>Considerable</b></p> <p>The setting is essential to our understanding of the significance of the heritage asset with the assumption that any harm to that setting would</p>	<p><b>Red</b></p> <p>The development of the site is likely to result in substantial harm to a designated heritage asset.</p>

Farrell and Clark rating	Equivalent Historic England rating
be constitute substantial harm to the heritage asset and would require full justification.	
<p><b>High</b></p> <p>The setting is very important to the significance of the asset and careful consideration is required to assess if the harm is substantial or less than substantial and whether the harm can be mitigated</p>	
N/A	<p><b>Orange</b></p> <p>The impact of the development of these sites on the historic environment is uncertain.</p>
<p><b>Moderate</b></p> <p>The setting is important to the significance of the asset and requires assessment with the assumption that any harm will be less than substantial and can be mitigated.</p>	<p><b>Yellow</b></p> <p>The allocation of this site could impact on a designated heritage asset but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment.</p>
<p><b>Slight</b></p> <p>The setting provides some contribution to the heritage asset but not to the extent that any alteration will cause harm.</p>	<p><b>Green</b></p> <p>The development of the site is unlikely to result in harm to any designated heritage asset.</p>
<p><b>Negligible</b></p> <p>The setting provides little or no contribution to the heritage asset.</p>	

- 2.22 It should be noted that the HIAs did not assess all allocated sites rated as 'orange' by Historic England, and therefore uncertain (?) in the SA. Sites not assessed in the HIA included:
- (i) Safeguarded land sites (i.e. those sites with a SL prefix), because no development is planned for these sites during the plan period. Under Policy PLP 6 these sites will be protected from development other than that which is necessary in relation to the operation of existing uses, change of use to alternative open land uses or temporary uses. This applies to sites SL2170A and SL2170B.
  - (ii) Sites that have been granted planning consent, on the basis that the granting of planning consent has demonstrated that development can take place with no substantial harm to the historic environment assets. This applies to sites H116, H130, H202, H215, H221, H288a, H292, H294, H343, H356, H518, H550, H3379, and H3395.
  - (iii) Sites considered 'sound' by Historic England in its consultation response to the Publication Draft Local Plan. This applies to sites H199, H203, H218, H313, H2585, H2586, H3405, ME2248a, ME2259, ME2267a, ME2312a, ME2314, MX1920, and MX1930.
  - (iv) Sites screened out from requiring HIA by Kirklees internal heritage team, due to their not having the potential for harm to historic environment assets taking into account Policy PLP 35 'Historic Environment'. This applies to sites H31, H172, H779, H1679, H2684a, MX1911, MX1912a, ME2248b, ME2248c, ME2568, and ME3324.
  - (v) Sites screened out from requiring HIA by Kirklees internal heritage team, due to the provision of a heritage statement by the site promoter, which Kirklees Council consider to be satisfactory evidence to demonstrate that development can take place with no substantial

harm to the historic environment assets. This applies to sites H67, H172, H351, H567, H591, H688, H708, E1832c, and E2333a.

- 2.23 In addition, it should be noted that four sites were incorrectly given uncertain effects ('?') in the SA Report of the Publication Draft Local Plan. Historic England classed them as being 'Green', and therefore they should have been given 'uncertain negligible' scores ('0?'). These sites were H307, H810, H1657 and GTTS2487.
- 2.24 For the purposes of SA and meeting the requirements of the SEA Regulations, it is reasonable to assume that none of the sites listed under (i) to (v) above will have significant negative effects on the historic environment.
- 2.25 The HIA undertaken by Farrell & Clark therefore focused on those sites originally classed as 'orange' by Historic England, and therefore uncertain (?) in the SA Report, that did not fall into the above five categories. These are the sites where uncertainty still existed prior to the HIA being undertaken.
- 2.26 These ratings by Farrell and Clark have now removed much of the uncertainty surrounding the sensitivity to development of those allocated sites that were previously assessed as having uncertain effects with regards to SA objective 13: historic environment. As such, the SA scores presented in the October 2016 SA Report for these sites have been revised, as shown in **Table 2.3** below. All of the sites presented in **Table 2.3** were previously scored uncertain (?) in terms of their effects on SA objective 13.

**Table 2.3 Revised SA scores following HIA**

Allocated Site subject to HIA	Farrell & Clark overall rating	Rating (Historic England equivalent)	Revised SA score
H40	Slight	Green	<b>0?</b>
H95	Moderate	Yellow	<b>-?</b>
H101	Moderate	Yellow	<b>-?</b>
H102	Moderate/Slight	Yellow	<b>-?</b>
H198	Slight	Green	<b>0?</b>
H442	Moderate/Slight	Yellow	<b>-?</b>
H508	Slight	Green	<b>0?</b>
H584	Slight	Green	<b>0?</b>
H623	Slight	Green	<b>0?</b>
H660	Slight/Moderate	Yellow	<b>-?</b>
H664	Moderate/Slight	Yellow	<b>-?</b>
H689	Slight/Moderate	Yellow	<b>-?</b>
H690	Moderate/Slight	Yellow	<b>-?</b>
H706	Slight/Moderate	Yellow	<b>-?</b>
H715	Slight/Moderate	Yellow	<b>-?</b>
H730	Moderate/Slight	Yellow	<b>-?</b>

Allocated Site subject to HIA	Farrell & Clark overall rating	Rating (Historic England equivalent)	Revised SA score
H738	Moderate	Yellow	-?
H761	Moderate/Slight	Yellow	-?
H763	Slight/Negligible	Green	0?
H764	Slight/Negligible	Green	0?
H768	Slight	Green	0?
H783	Slight	Green	0?
H786	Slight	Green	0?
H1728A	Moderate	Yellow	-?
H1774	Moderate/High	Red	--?
H2649	Moderate	Yellow	-?
H2667	Moderate/Slight	Yellow	-?
H2730a	Slight	Green	0?

- 2.27 The HIA found that none of the sites would result in substantial harm to the historic environment, with the potential exception **of H1774 Land adjacent to The Village in Thurstonland**. Examination of the detail of the HIA of this site indicates that, despite its sensitivity, development is possible without causing substantial harm so long as the mitigation measures set out in the HIA are implemented.
- 2.28 The Council has confirmed that sites will only be considered to be deliverable if significant adverse impacts on heritage assets are avoided in accordance with Policy PLP 35.

### Conclusion

- 2.29 In light of the above evidence, Policy PLP35 Historic Environment, alongside the text in the site allocations box (reports required) relating to the need for a Heritage Impact Assessment to be submitted alongside planning applications (utilising or supplementing existing HIAs that are part of the local plan evidence base) provides the appropriate mitigation to ensure that significant impacts on the historic environment will not occur.

### 3 Omitted SA findings for safeguarded land option (SL2273)

- 3.1 Due to a clerical error, the October 2016 SA Report did not include the SA findings for the safeguarded land option SL2273. This option was subject to SA alongside other safeguarded land options and the option has been allocated in the Publication Draft Local Plan. This Addendum presents the assessment of this option that was omitted from the October 2016 SA Report.
- 3.2 Table 1 in Annex 1 of the October 2016 SA Report included reference to site H771 linking it to safeguarded land SL2273. The linking of these sites was made in error given that site H771 no longer exists as a reasonable local plan option. Table 1 of Annex 1 of the October 2016 SA Report should therefore be updated as detailed in **Table 3.1** below.

**Table 3.1 Amendments to Table 1 in Annex 1 of the October 2016 SA Report following updates in relation to consideration of appropriate safeguarded land**

Safeguarded site code	Original housing site option code
SL2273	<u>N/A</u>

- 3.3 A summary of SA findings for SL2273 is given in **Table 3.2** overleaf. A more detailed assessment of this site is presented in **Appendix 1** of this Addendum.

**Table 3.2 Summary of likely effects of safeguarded land option SL2273**

SA objective	SL2273
<b>1: Employment</b>	++
<b>2. Economy</b>	0
<b>3. Education</b>	++?
<b>4. Health</b>	+
<b>5. Local amenity</b>	--
<b>6. Access to local services and facilities</b>	-
<b>7. Crime</b>	0
<b>8. Open space</b>	++
<b>9. Housing</b>	+
<b>10. Sustainable transport</b>	++
<b>11. Land use</b>	-
<b>12. Landscape and townscape</b>	-?
<b>13. Historic environment</b>	0?
<b>14. Biodiversity and geodiversity</b>	--?
<b>15. Reduce air, water and soil pollution</b>	0
<b>16. Flood risk areas</b>	-
<b>17. Waste</b>	-
<b>18. Water, energy and raw material use</b>	0
<b>19. Climate change</b>	++

- 3.4 As identified in the table above the safeguarded land option SL2273 is expected to have a number of significant positive effects in relation to the SA objectives against which it has been considered. As the site is located mostly within 16-20 minutes travel time to the nearest employment node, mostly within 11-15 minutes travel time of a primary school and mostly within 16-20 minutes travel time of a secondary school, significant positive effects have been identified in relation to **SA objectives 1: employment** and **3: education**.
- 3.5 The close proximity of these features has been identified through 'heatmapping' work which has been undertaken on behalf of the Council, which has also helped to identify likely significant positive effects for SA **objectives 10: sustainable transport** and **19: climate change**. These effects are expected given the close proximity of the four of eight features assessed, which may mean that residents are encouraged to make use of sustainable and active modes of transport.
- 3.6 'Heatmapping' work for the Council has also identified that while the site is located mostly within 6-10 minutes travel time of a GP it is less accessible to hospital (within 31-35 minutes travel time), meaning an overall minor positive effect has been identified for **SA objective 4: health**. This work for the Council has identified that access to local centres and town/district centres is relatively poor from this location, meaning a minor negative effect is expected for **SA objective 6: access to services and facilities**.
- 3.7 Two significant negative effects have been identified for this safeguarded land option, against **SA objectives 5: local amenity** and **14: biodiversity and geodiversity**. The site is located adjacent to the A653 meaning noise pollution may negatively affect amenity of residents at this location, if is the site were to be **developed**. As the site is located in close proximity (55m) of Local Geological Site, Caulms Wood Quarry, it is expected that future development at this location might result in negative impacts on geodiversity.

- 3.8 Safeguarded land option SL2273 is located on a greenfield site, which is considered to be relatively small in size. As such its future development may result in loss of greenfield land which could cause adverse impacts on landscape character and contribute to a more inefficient pattern of use of land in the District. These impacts are likely to be limited due to the lesser size of this site which is under 5ha and as such minor negative effects has been recorded for **SA objectives 11: land use** and **12: landscape and townscape**.
- 3.9 As this safeguarded land option consists of greenfield land it is expected to provide reduced opportunities in relation to the recycling and re-use of materials and buildings which are more likely to be present onsite at brownfield land and therefore a minor negative effect has been recorded for **SA objective 17: waste**. A further minor negative effect has been recorded for this safeguarded land option in relation to **SA objective 16: flood risk** as development of the site would increase the area of impermeable surfaces in Kirklees, thus increasing flood risk.
- 3.10 The smaller size of this safeguarded land option (0.47ha) means that while its future development may contribute to meeting housing need in Kirklees this contribution is likely to be limited. As such the positive effect identified in relation to **SA objective 9: housing** is expected to be minor.
- 3.11 Work undertaken by Historic England has informed the appraisal in relation to the historic environment. For this safeguarded land option a negligible effect has been recorded in relation to **SA objective 13: historic environment**. This is because the assessment work undertaken by Historic England has found that the future development of this safeguarded land option is unlikely to result in harm to any designated heritage asset and as such it has rated the site as 'green'.
- 3.12 SL2273 is not located in close proximity to an AQMA meaning it is unlikely to lead to intensification of identified air quality issues in the District. As such a negligible effect has been recorded for **SA objective 15: reduce air, water and soil pollution**. The specific location of future residential development in the District is unlikely to have direct effects on **SA objectives 2: economy, 7: crime** and **18: waste, energy and raw material use**. These SA objectives are more likely to be directly affected by the quantum of development proposed and the design of new development in the District, rather than being site-specific, and therefore negligible effects have been recorded for these three SA objectives.

## 4 Update of residential site option H138 appraisal following consultee comments

- 4.1 The October 2016 SA Report and the Kirklees Publication Draft Local Plan (November 2016) were published for consultation from November 2016 to December 2016. Comments received during this process identified that the appraisal of site H138 (Land south of Mill Street, Birstall) overlooked an area of open space (the football pitch between Mill Street and Park Street in Birstall). Following further enquiries with Kirklees Council it has been clarified that this area of open space is within the boundaries of the site, but had been omitted from the GIS layer of open spaces provided to LUC. As such it was established that site H138 requires partial reappraisal; i.e. with regard the potential loss of this area of open space.
- 4.2 A summary of the updated likely effects is presented in **Table 4.1** below. The updated appraisal for residential site option H138 has been changed only in relation to SA objective 8. The change has been highlighted within the black borders in the table below.

**Table 4.1 Summary of change of likely effects for site H138**

SA objective	Site H138 (likely effects identified)	
	In October 2016 SA Report	After reappraisal
<b>1: Employment</b>	++	++
<b>2. Economy</b>	0	0
<b>3. Education</b>	+?	+?
<b>4. Health</b>	++	++
<b>5. Local amenity</b>	--	--
<b>6. Access to local services and facilities</b>	+	+
<b>7. Crime</b>	0	0
<b>8. Open space</b>	++	++/--?
<b>9. Housing</b>	++	++
<b>10. Sustainable transport</b>	++	++
<b>11. Land use</b>	--	--
<b>12. Landscape and townscape</b>	--?	--?
<b>13. Historic environment</b>	0?	0?
<b>14. Biodiversity and geodiversity</b>	0?	0?
<b>15. Reduce air, water and soil pollution</b>	0	0
<b>16. Flood risk areas</b>	-	-
<b>17. Waste</b>	-	-
<b>18. Water, energy and raw material use</b>	0	0
<b>19. Climate change</b>	++	++

- 4.3 Only the assessment for SA objective 8: recreation has been amended from the findings of the October 2016 SA Report. The significant positive effect previously identified for this SA objective has been updated to a mixed overall effect (significant positive/uncertain significant negative), as development may result in the loss of the football pitch which lies within the site boundaries. The assessment text from Annex 1 of the October 2016 report has been updated as follows:

*The site is located in close proximity to a number of open spaces and also provides access to a footpath within 95m, to the east on Smithies Moor Rise. The site is located within 230m of an area of amenity greenspace to the north east. To the east of the site within 110m an area of semi-natural and natural greenspace and an outdoor sports facilities site are provided on Lea Road. To the south of the site, within 110m, further outdoor sports facilities are provided. A significant positive effect is therefore identified given the relative proximity of open space to the site. This significant positive effect is likely to be combined with a significant negative effect however, given that part of the site contains a football pitch, which is recommended for protection in the Playing Pitch Strategy. Development of this site may lead to loss of a recreational resource for local people. The significant negative effect is uncertain dependent upon the design of the development which is unknown at this stage.*

- 4.4 The Council has clarified that if this site were to be developed, mitigation would be required through a replacement playing pitch. However this has not influenced the SA in order to keep assessments consistent with the SA Framework and between sites.

## 5 Update of residential site option H2730a appraisal following consultee comments

- 5.1 The October 2016 SA Report and the Kirklees Publication Draft Local Plan (November 2016) were published for consultation from November 2016 to December 2016. Comments received during this process identified that there was an error in the description of site H2730a with regards to surrounding development, which influenced the scoring of SA objective 5: Local amenity. As such it was established that an update is required to appraisal of site H2730a.
- 5.2 A summary of the updated likely effects is presented in **Table 5.1** below. The updated appraisal for residential site option H2730a has been changed only in relation to SA objective 5. The change has been highlighted within the black borders in the table below.

**Table 5.1 Summary of change of likely effects for site H2730a**

SA objective	Site H2730a (likely effects identified)	
	In October 2016 SA Report	After reappraisal
<b>1: Employment</b>	++	++
<b>2. Economy</b>	0	0
<b>3. Education</b>	++?/0?	++?/0?
<b>4. Health</b>	+/0	+/0
<b>5. Local amenity</b>	--	-
<b>6. Access to local services and facilities</b>	+/-	+/-
<b>7. Crime</b>	0	0
<b>8. Open space</b>	++/--	++/--
<b>9. Housing</b>	++	++
<b>10. Sustainable transport</b>	++	++
<b>11. Land use</b>	--	--
<b>12. Landscape and townscape</b>	--?	--?
<b>13. Historic environment</b>	?	?
<b>14. Biodiversity and geodiversity</b>	--?	--?
<b>15. Reduce air, water and soil pollution</b>	0	0
<b>16. Flood risk areas</b>	-	-
<b>17. Waste</b>	-	-
<b>18. Water, energy and raw material use</b>	0	0
<b>19. Climate change</b>	++	++

- 5.3 Only the assessment for SA objective 5: local amenity has been amended from the findings of the October 2016 SA Report. The significant negative effect previously identified for this SA objective has been updated to a minor negative effect to reflect the fact that the site is not surrounded by

existing residential development. The assessment text from Annex 1 of the October 2016 report has been updated as follows:

*Where new residential development is proposed within close proximity of sensitive receptors there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. New residential development within close proximity of major roads or railways or industrial areas may result in noise pollution affecting residents in the longer term. This site is adjacent to a number of residential dwellings to the north. As such, there is potential for development of this site to increase noise and light pollution experienced by the residents of those properties, leading to a negative effect on this SA objective.*

## 6 Additional amendments to the SA Report following changes to the expected sustainability effects

- 6.1 This section details other amendments required to the October 2016 SA report as a result of the amendments to the SA detailed in **Sections 2 to 5** of this addendum. SA focuses on those impacts likely to be significant<sup>1</sup>, therefore the main body of the SA report focuses on these. As such, the following amendments detailed in this section generally relate to changes in significant effects.
- 6.2 The changes to the October 2016 SA Report (detailed below) take into consideration those updates which have already been detailed in the November 2016 SA Report Erratum Notice, which presented amendments to the findings for three residential site options (H288, H288a and H68) and two safeguarded land options (SL2170a and SL2170b).
- 6.3 Changes which have been identified in relation to the expected sustainability effects for safeguarded land option SL2273 and sites H138 and H2730a mean that amendments to the October 2016 SA Report for Kirklees Local Plan: Publication Draft and Non-Technical Summary will be required. Where the text below requires changes to the October 2016 SA Report, the updated text presented in this addendum supersedes the identified corresponding text in the October 2016 SA Report. As the Non-Technical Summary only discusses significant effects, any changes in non-significant effects do not require changes to this part of the SA Report.
- 6.4 Chapter 4 of the SA Report for Kirklees Local Plan: Publication Draft summarises the likely effects of the residential site options considered. Given the additional safeguarded land option SL2273, which is now considered within this Addendum, any reference to the total number of sites considered by the SA Report will be required to be updated from 982 to 983. The summary of likely residential site options takes into consideration those options which are safeguarded land. The total number of safeguarded land options will be required to be updated from 91 to 92 throughout the entirety of the SA Report. Again, this Chapter only discussed significant effects therefore only changes in the assessment of significant effects have led to changes in this part of the SA Report.
- 6.5 The amendments presented in the remainder of this section relate to the total number of sites identified which would have a specified effect on a related SA objective. Where this Addendum provides additional text to the October 2016 SA Report this is shown as underlined text and where this Addendum deletes text from the October 2016 SA Report this is shown as ~~striketrough~~.
- 6.6 The summary of effects is presented in Chapter 4 of the October 2016 SA Report from paragraph 4.12. **Table 6.1** below details the changes which are required to this summary of effects as a result of the inclusion of safeguarded site option SL2273 and/or the reappraisal of residential site options H138 and H2730a.

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<sup>1</sup> Planning Practice Guidance (2014) Paragraph 009 Reference ID: 11-009-20140306

**Table 6.1 Summary required changes to the summary of findings in the October 2016 SA Report**

Paragraph number	SA objective	Amendment to text
Changes due to inclusion of safeguarded land option SL2273		
4.14	SA objective 1: employment	Significant positive effects alone were identified in relation to <del>400</del> <u>401</u> of the <del>982</del> <u>983</u> residential site options (or <del>40%</del> <u>41%</u> ).
4.21	SA objective 3: education	Potential significant positive effects alone were identified in relation to <del>421</del> <u>422</u> of the <del>982</del> <u>983</u> options (43%) as they are mainly or entirely within 0-15 minutes journey time (via non-car based modes of transport) of a primary school and 0-20 minutes of a secondary school. Some are also within 30 minutes travel time of a further education facility.
4.31	SA objective 5: local amenity	Of the <del>982</del> <u>983</u> residential site options, 397 (40%) were identified as having a likely significant negative effect on this SA objective either because they are surrounded by existing residential development or other sensitive receptors, or because they are directly adjacent to an 'A' road, motorway or railway line or an industrial area.
4.42	SA objective 8: open space	Of the <del>982</del> <u>983</u> residential site options, almost all ( <del>978</del> ) ( <u>979</u> ) are within 600m of three or more areas of open space, playing fields/sports facilities, cycle paths, footpaths or bridleways and are likely to have a significant positive effect on SA objective 8.
4.15	SA objective 10: sustainable transport	Of the <del>982</del> <u>983</u> residential site options, <del>711</del> <u>712</u> (a significant positive effect on this SA objective as they are mapped as 'green' for at least four of the eight features).
4.60	SA objective 12: landscape and townscape	A further <del>711</del> <u>712</u> sites (72%) may have a minor negative effect as they are small in size but are entirely or mainly on greenfield.
4.64	SA objective 13: historic environment	<p>Only five (0.5%) of the residential site options were rated by Historic England as 'red' on the basis that the development of the site is likely to result in substantial harm to a designated heritage asset. <u>The Heritage Impact Assessment (HIA) undertaken by Farrell and Clark identified one further site, H1774, with potential for significant negative effects, although such effects could be mitigated. Therefore six (0.6%) of residential site options are likely to have significant negative effects on this SA objective.</u></p> <p>A further 28 (3%) sites could have a minor negative effect as they were assessed by Historic England as 'yellow', meaning that the allocation of the site could impact on a designated heritage asset, but its development is unlikely to result in harm to that asset if the development accords with the anticipated Local Plan policies for managing change to the historic environment. <u>The findings of the Farrell and Clark HIAs have resulted in a further 16 sites being identified as having equivalent Historic England ratings of 'yellow'. Therefore a total of 44 (4%) residential site options are assessed as having minor negative effects on this SA objective.</u></p>

4.66	SA objective 13: historic environment	<p>A further 335 (34%) sites <del>could have uncertain effects on SA objective 13 as they</del> were identified as 'orange' by Historic England as their likely effects on the historic environment <del>were considered uncertain</del>. <u>Following HIAs by Farrell and Clark, a number of these were given an updated 'Historic England equivalent' rating, as described in Section 2 of the SA Addendum.</u></p> <p>The remaining <del>614</del> <u>615</u> (63%) sites were classed as 'green' by Historic England, meaning that the development of the site is unlikely to result in harm to any designated heritage asset. Those <del>614</del> <u>615</u> sites are therefore most likely to have a negligible effect on this SA objective, although this is again uncertain. <u>The HIAs undertaken by Farrell and Clark identified a further 11 sites as having a 'green' Historic England equivalent rating. Therefore the total number of sites assessed as having negligible effects against this SA objective is 626 (64%)</u></p>
4.71	SA objective 14: biodiversity and geodiversity	Of the <del>982</del> <u>983</u> residential site options, <del>198-199</del> (20%) were identified as having a potentially significant negative effect on this SA objective as they are within 250m of one or more designated biodiversity or geodiversity sites.
4.81	SA objective 16: flood risk	The majority of sites ( <del>870</del> <u>871</u> sites or 89% of all residential sites considered) have been identified as being located on greenfield land outside of flood zones 3a or 3b and are therefore likely to have a minor negative effect on this SA objective.
4.83	SA objective 17: waste	<i>Of the <del>982</del> <u>983</u> residential site options, 92 (9%) were identified as having potential minor positive effects on this SA objective as they are on brownfield land, while the remaining <del>890</del> <u>891</u> (91%) sites would have a minor negative effect as they are on greenfield land.</i>
4.88	SA objective 19: climate change	As described above under SA objective 10, <del>711</del> <u>712</u> (72%) of the <del>982</del> <u>983</u> site options were identified as likely to have a significant positive effect on this objective as they were considered to have a good level of access to at least four of the eight features assessed.

- 6.7 Due to the changes required to the text which details the summary of likely sustainability effects (as shown in **Table 6.1** above) some maps which have been provided in Annex 1 of the October 2016 will also have to be amended.
- 6.8 The consideration of safeguarded land option SL2273 in this Addendum will mean that its location will be added to the following maps in Annex 1:
- Map R1 (residential sites with a significant positive effect on SA objective 1: employment)
  - Map R3 (residential sites with a significant positive effect on SA objective 3: education)
  - Map R7 (residential sites with a significant negative effect on SA objective 5: amenity)
  - Map R10 (residential sites with a significant positive effect on SA objective 8: open space)
  - Map R12 (residential sites with a significant positive effect on SA objective 10: sustainable transport)
  - Map R18 (residential sites with a significant negative effect on SA objective 14: biodiversity and geodiversity)
  - Map R22 (residential sites with a significant positive effect on SA objective 19: climate change)
- 6.9 Similarly as a result of the reappraisal of residential site option H138 Map R10 will need to be amended to show the location of this site as likely to have an overall mixed effect (significant positive effect/significant negative effect) on SA objective 8: open space. Site H2730a will need to be removed from Map R7 (Residential sites with a significant negative effect on SA objective 5: amenity).
- 6.10 In addition, the following sites will need to be added to Map R17 (Residential sites with a minor or significant negative effect on SA Objective 13 – Historic Environment):
- H95
  - H101
  - H102
  - H442
  - H660
  - H664
  - H689
  - H690
  - H706
  - H715
  - H730
  - H738
  - H761
  - H1728A
  - H1774
  - H2649
  - H2730a
- 6.11 As a result of the amendments to site assessments included in this addendum, the summary of all residential sites subject to SA, which is included in Table 4.1 of the October SA Report, will also need to be adjusted accordingly.
- 6.12 Residential site options H138, H2730a and those included in **Table 2.3** of this addendum, along with safeguarded land option SL2273, have been included for allocation within the Publication Draft Kirklees Local Plan. As such the likely sustainability effects shown in **Table 2.3, Table 3.2, Table 4.1** and **Table 5.1** of this Addendum will be carried through to Table 12.19 of the October 2016 SA Report. Table 12.19 details the likely sustainability effects of those sites which have allocated in the Publication Draft Kirklees Local Plan.
- 6.13 Given the high total number of residential sites allocated in the Publication Draft Kirklees Local Plan the update that this Addendum provides in relation to residential site options H138, H2730a and those included in Table 2.3 of this addendum, along with safeguarded land option SL2273, is not expected to affect the overall cumulative effects which are provided in paragraph 12.80 of the

October 2016 SA Report. As a result of the amendments to the expected sustainability effects of residential site options H138, H2730a and those included in **Table 2.3** of this addendum, along with the inclusion of safeguarded land option SL2273, and the subsequent updates which are required to the October 2016 SA Report these updates carry through to the SA Report: Non-Technical Summary where relevant. References to the total number of residential sites appraised are updated from 982 to 983. The number of options considered as safeguarded land will be required to be updated from 91 to 92.

- 6.14 Beyond these amendments, as the Non-Technical Summary presents only the main findings of the SA Report and does not contain the in-depth findings of this report, the updates required to be made following the amendments to the full SA Report will be less extensive.
- 6.15 Table 4 of the Non-Technical Summary, which shows those residential site options which are expected to have four or more significantly negative effects on the SA objectives, should also be amended. Table 4 should now include the updated likely sustainability effects for residential site option H138 but should no longer include the results for site H2730a.

## **Appendix 1**

Omitted SA matrix for the safeguarded land option  
(SL2273)

### SL2273: Land to North of Brookfield View, Cleckheaton

SA Objectives	SA Score	Justification
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	++	<p>While the location of housing sites will not influence the number, location or type of employment opportunities available in Kirklees, the proximity of housing to employment nodes can affect people's ability to access jobs.</p> <p>This site is located mostly within 16-20 minutes travel time from the nearest employment node (it is recognised that a small part of the site to the north west is located within 11-15 minutes travel time of the nearest travel node); therefore a significant positive effect on this objective is expected.</p>
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	0	The location of housing sites will not affect the success of the local economy. While housing development may result in job creation during the construction phase, this will not be influenced by the location of the development. Housing provision may also affect the size and location of the local workforce; however this is considered separately under SA objective 1 above. Therefore, the effects of all residential site options will be negligible.
3. Ensure education facilities are available to all.	++?	<p>The availability of school and college places to serve the growing population will depend in part on whether new places are provided as part of new housing developments, which is unknown at this stage. Effects will also depend on how accessible existing schools and colleges are from residential site options, although there are uncertainties as the effects will depend on there being capacity at those schools and colleges to accommodate new pupils.</p> <p>The site is located mostly within 11-15 minutes travel time of a primary school (the south eastern portion of the site is located within 16-20 minutes travel time of a primary school) and mostly within 16-20 minutes travel time of a secondary school (the south eastern portion of the site is located within 11-15 minutes travel time of a secondary school) so is likely to have a significant positive effect on this SA objective. The site is located mostly within 31-35 minutes travel time of a further education institute (the south eastern portion of the site is located within 36-40 minutes travel time of a further education institute).</p>
4. Improve the health of local people and ensure that they can access the health and social care they need.	+	<p>The location of housing sites will not affect the number or location of healthcare facilities; however where healthcare facilities are easily accessible from housing sites there will be positive effects on residents' health.</p> <p>The site is located mostly within 6-10 minutes travel time of a GP (it is recognised that the south eastern portion of the site is located within 11-15 minutes travel time of a GP). The site is located within variable travel times of a hospital. The north western portion of the site is located within 31-35 minutes travel time of a hospital and the south eastern portion of the site is located within 41-45 minutes travel time of a hospital. Areas of the site between these extremes are located at variable travel times of a hospital. A minor positive effect is therefore expected on this SA objective. The site is not within or adjacent to an AQMA.</p>
5. Protect local amenity including avoiding noise and light pollution.	--	Where new residential development is proposed within close proximity of sensitive receptors there may be negative effects on amenity as a result of increased noise and light pollution, particularly during the construction phase. New residential development within close proximity of major roads or railways or industrial areas may result in noise pollution affecting residents in the longer term.

SA Objectives	SA Score	Justification
		The site is adjacent to residential properties to the west on Well Street and to the east on Sugar lane. These properties may be affected by noise and light pollution during the construction phase. The site is also adjacent to the A653 to the north. As such new residents at this location may be impacted upon by noise pollution in particular from this main road. A significant negative effect on this SA objective is therefore likely.
6. Retain and enhance access to local services and facilities.	-	<p>The location of housing sites will not directly affect the number or range of services in a particular location (although a large scale housing development could potentially stimulate the provision of new services); however the location of housing sites could affect this objective by influencing people's ability to access existing services and facilities.</p> <p>The site is mostly located within 16-20 minutes travel time of a local centre (it is recognised that a portion of the site to the north west is located within 11-15 minutes travel time of a local centre). The majority of the site is located within 16-20 minutes travel time of a town/district centre (it is recognised that a portion of the site to the south east is located within 21-25 minutes travel time of a town/district centre); therefore a minor negative effect is likely.</p>
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	0	The effects of new housing developments on levels of crime and fear of crime will depend on factors such as the incorporation of green space within the housing sites which, depending on design and the use of appropriate lighting, could have an effect on perceptions of personal safety, particularly at night. However, such issues will not be influenced by the location of housing sites (rather they will be determined through the detailed proposals for each site) and so the effects of all of the potential residential sites on this SA objective will be negligible.
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	++	The site is within close proximity of a number of designated open spaces which may be used by new residents in the area. An area of amenity greenspace is located within 20m of the site to the north west. A further area of amenity greenspace is located within 10m of the site to the south. A park is located within 55m of the site to the north by Caulms Wood Road. The closest area of outdoor sports facilities is a golf course which is located within 35m to the north east of the site. It is however recognised that the identified golf course is not a public recreation facility and may not be accessible for all residents. As such the development of the site for housing may encourage new residents to partake of more active lifestyles given the close proximity of the identified open spaces. A significant positive effect is therefore expected on this SA objective.
9. Ensure all people are able to live in a decent home which meets their needs.	+	All of the potential residential sites are expected to have positive effects on this objective, due to the nature of the proposed development and it is assumed that housing developments will include an appropriate proportion of affordable housing. This site is relatively small (0.47ha); therefore a minor positive effect is likely.
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	++	<p>How well connected housing sites are to services, facilities and employment opportunities by sustainable modes of transport will affect the extent to which residents are able to make use of non car-based modes of transport day to day.</p> <p>In the accessibility heat mapping work that was undertaken for Kirklees Council, this site was classed as 'green' in terms of its access to four of the eight features assessed. Therefore, a significant positive effect is likely.</p>
11. Secure the efficient and prudent use of land.	-	<p>Where development takes place on greenfield land or areas of high quality agricultural land it is a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.</p> <p>This is a relatively small site (0.47ha) on greenfield land; therefore a minor negative effect on this SA objective is likely.</p>

SA Objectives	SA Score	Justification
		The site has been identified as being located on Urban Land, according to Natural England's Agricultural Land Classification.
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	-?	This is a relatively small site (0.47ha) on greenfield land; therefore development here could have a minor negative effect on this SA objective, although this is uncertain depending on the design of the development.  The site is not within 500m of the Peak District National Park.  The site lies in an area classed as 'urban' in the 2015 Landscape Character Assessment for Kirklees.
13. Conserve and enhance the historic environment, heritage assets and their settings.	0?	Historic England has rated this site as 'green' in terms of the potential for effects on the historic environment, meaning that it considers that the development of the site is unlikely to result in harm to any designated heritage asset. The effect on this SA objective is therefore likely to be negligible although this is uncertain as the potential for effects on cultural heritage assets will depend on the exact scale, design and layout of the new development and opportunities may exist to enhance the setting of heritage features.
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	--?	The site is within 55m of Caulms Wood Quarry, Dewsbury to the north west which has been identified as a Local Geological Site. The close proximity of the site to this designated geodiversity feature may result in potential detrimental impacts, e.g. through habitat damage, disturbance to species and geology, air pollution, trampling etc. and as such a minor negative effect is recorded for this SA objective. The effect is recorded as uncertain given that there may be opportunities to promote habitat connectivity through the inclusion of green infrastructure with any development.
15. Reduce air, water and soil pollution.	0	This site is not within an AQMA; therefore a negligible effect on this SA objective is likely.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	-	This site is on greenfield land and is located outside of flood zones 2 and 3; therefore a minor negative effect is likely given that the development of new housing on this greenfield land would increase the area of impermeable surfaces in Kirklees and could therefore increase local flood risk.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	-	Where housing development is proposed on brownfield land, there may be good opportunities for using existing buildings and materials although this is uncertain depending on the previous use of the site. However, this site is on greenfield land; therefore a minor negative effect is likely.

SA Objectives	SA Score	Justification
18. Increase efficiency in water, energy and raw material use.	0	While all new residential development is likely to involve an increase in energy and water consumption this will not be influenced by the location of residential sites. Similarly, all residential development will result in the increased consumption of minerals for construction but this will not be influenced by the location of residential sites. Therefore, all sites will have a negligible effect on this SA objective.
19. Reduce the contribution that the district makes to climate change.	++	<p>The location of residential development will not affect the contribution that the buildings make to climate change, which will be influenced by other factors such the design of the buildings. However, where residential sites are well-connected by sustainable transport links to employment nodes, services and facilities, levels of car use and the associated greenhouse gas emissions are likely to be lower.</p> <p>This site is classed as 'green' in terms of its access to four of the eight features assessed; therefore a significant positive effect is likely.</p>
<p><b>Summary of SA findings:</b> Potential significant positive effects were identified for this site in relation to SA objectives 1: employment, 3: education, 8: recreation and leisure, 10: sustainable transport and 19: climate change and potential significant negative effects were identified in relation to SA objective 5: amenity and 14: biodiversity and geodiversity. Potential significant negative effects will need to be considered further in terms of mitigation and/or enhancement, which may be achieved through Local Plan policies.</p>		