

Methodology

Part 2: Site Allocation Methodology

April 2017

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Contents

1. INTRODUCTION	3
The Publication Draft Local Plan	3
2. SITE SIZE THRESHOLD	4
Small sites in the green belt.....	4
Small sites that affect urban green space allocations	4
Other small sites	4
3. SOURCES OF SITES	5
4. CONSIDERATION OF SITE OPTIONS – METHODOLOGY	6
Urban Green Space	6
Local Green Space	7
Options to add land to or remove land from the green belt.....	8
Development site options.....	9
Technical Assessment of Development Options	12
5. SAFEGUARDED LAND	22
6. SUSTAINABILITY APPRAISAL	22
7. HABITATS REGULATIONS ASSESSMENT.....	23

1. INTRODUCTION

- 1.1. The National Planning Policy Framework (NPPF) 2012 states that a fundamental part of the Local Plan is to allocate sites to promote development and the flexible use of land, bring forward new land where necessary and provide detail on the form, scale, access and quantum of development where appropriate. In order to do this, National Planning Practice Guidance (NPPG) 2014 provides clarity in the production and deliverability of local plans. It requires planning authorities to provide sufficient detail about the nature, location and scale of development when proposing allocations.
- 1.2. The publication draft Local Plan takes into account the need to provide sustainable development to meet needs in Kirklees. Site allocations are integral to the publication draft Local Plan as it is these which will facilitate the delivery of the local plan's spatial strategy. The council has identified sites to allocate for housing, employment, open space, minerals, waste facilities and other uses. These sites are required to accommodate a growing population, to create new places and spaces reflecting the needs and priorities of their communities and to ensure that the mutually dependent economic, social and environmental pillars of sustainability are met.

The Publication Draft Local Plan

- 1.3. Site options for development and protection have been submitted to the council from a number of sources. Where an option for a site has been accepted it appears on the Publication Draft Local Plan Policies Map as an allocation or designation. Site specific information for each individual accepted option is included in the Allocations and Designations document. For development options, details of the site address, site area, constraints identified through the site allocations process and an indication of the supporting technical information which may be required at the planning application stage are provided. Where a decision has been made to reject a site option, these are shown on a separate 'rejected options' plan and a summary of the reasons why the option has been rejected is provided in the rejected options report.
- 1.4. The Kirklees publication draft Local Plan was published for consultation on 7th November 2016 for a period of 6 weeks. This formal six week consultation period was held to establish whether the Plan is legally compliant and fulfils the four tests of soundness; positively prepared, justified, effective and consistent with national policy. The council has submitted the Local Plan to the Planning Inspectorate with an examination in public expected later in the year.

2. SITE SIZE THRESHOLD

- 2.1. The threshold for allocation of sites in the Local Plan is 0.4ha. Any site that was submitted to the Council for consideration that was of 0.4ha or larger was assessed through the site allocations process that is set out in this document.

Small sites in the green belt

- 2.2. Sites for consideration of less than 0.4ha that are in the green belt have been assessed as part of the green belt review and the outcome of the assessment process can be viewed in Green Belt Boundary Changes document at: www.kirklees.gov.uk/localplan. This process considered the position of the site relative to the settlement edge and whether the position of the green belt boundary could be adjusted to accommodate the site. Exceptional circumstances would be required to amend the position of the green belt boundary.

Small sites that affect urban green space allocations

- 2.3. Some sites of less than 0.4ha have been submitted to the council for consideration either for inclusion as urban green space, removal from urban greenspace or for an adjustment to the boundary of an urban green space site, for example to remove a garden that does not perform an urban green space function. The outcomes of these assessments can be viewed in the Urban Green Space and Local Green Space Technical Paper at: www.kirklees.gov.uk/planningpolicy.

Other small sites

- 2.4. Sites that have been submitted to the council that are less than 0.4ha and not affected by either green belt or urban green space designation have not been assessed as part of the allocations process. As these sites are not allocated they would be classed as 'windfall sites'. An allowance for such sites has been included in the housing and employment calculations. These sites can continue to be considered for development or change of use through the consideration of planning applications.

3. SOURCES OF SITES

3.1. There are a number of sources of site options which have been considered through the Local Plan process, either for protection or development:

- **Call for Sites**

The opportunity to submit sites to be considered for development or protection in the Local Plan has been available since the adoption of the Unitary Development Plan (UDP) in 1999. A formal 'Call for Sites' process has been available since 2008 with publicity at various stages of the plan preparation process. The Call for Sites process was also publicised during the early engagement period in 2014. The deadline for sites to be submitted for inclusion in the publication draft Local Plan was 12th August 2016. Sites received after this will be assessed in the same way and considered by the inspector at the examination stage of the Local Plan process.

- **Council asset review**

The council has reviewed its land and building assets. The outcomes of this review provided a further source of potential development sites to be tested through the Local Plan site allocation process.

- **Existing UDP allocations**

The council has assessed partly developed and undeveloped UDP housing and employment allocations. These sites have been assessed for their continued suitability for housing or employment development within the Local Plan. The council has assessed whether land currently designated as Provisional Open Land (POL) within the UDP is suitable to accommodate development within the Local Plan period. Existing UDP urban green space sites have also been considered in terms of their continuing suitability for protection.

4. CONSIDERATION OF SITE OPTIONS – METHODOLOGY

- 4.1. The following sections set out the site allocation methodologies used to determine whether to accept or reject site options. These include:
- Urban green space;
 - Local green space;
 - Options to add land to or remove land from the green belt;
 - Development (housing, employment, mixed use, Traveller sites, minerals and waste).

Urban Green Space

- 4.2. A review of urban green space has been undertaken to identify important green spaces in the urban areas requiring protection from development and meriting allocation as urban green space in the Local Plan. The assessment process is summarised below but detailed information relating to the assessment of sites is set out in the “Urban Green Space and Local Green Space” technical paper and Open Space Study published alongside the publication draft Local Plan.
- 4.3. The following sources of sites have been included in the urban green space review:-
- existing urban green spaces identified in the Kirklees Unitary Development Plan 1999;
 - open space sites of 0.4 hectares or above in size identified in the Kirklees Open Space Study 2015 (Revised 2016) and Playing Pitch Strategy (2015); and
 - sites submitted to the council to be considered for allocation as urban green space in the Local Plan.
- 4.4. The assessment has taken account of the Open Space Study assessment (including analysis of deficiencies), Playing Pitch Strategy, Built Leisure and Sports Facilities Strategic Framework, Wildlife Habitat Network and public health information. This has resulted in the following assessment outcomes:

Green	Important open space, sport or recreation site required to meet local needs and meriting designation as Urban Green Space. Includes sites recommended for protection in the Playing Pitch Strategy (2015).
Amber	Open space, sport or recreation sites may be required to meet local needs or help address open space deficiencies or health inequalities in the area.
Red	Site is not considered to be in open space, sport or recreation use or has been assessed as low value in the Open Space Study (2015) and is not required to meet local needs. Includes sites identified as potentially surplus to requirements in the Playing Pitch Strategy (2015).

- 4.5. The decision to accept or reject sites for allocation as Urban Green Space in the publication draft Local Plan has been based on the technical assessment and overall

conclusion for the site. The decision to accept or reject an Urban Green Space option is based on the following:

Accept	Sites rated with a green overall open space conclusion providing replacement provision or mitigation measures are proposed.
Reject	Sites rated with a red overall open space conclusion. Sites rated with an amber overall open space conclusion having insufficient justification as allocation as Urban Green Space. Sites rated with a green overall open space conclusion, providing replacement provision or mitigation measures.

- 4.6. Further details of the assessment and outcomes can be found in the “Urban Green Space and Local Green Space” technical paper.

Local Green Space

- 4.7. NPPF (paragraph 77) states that the Local Green Space designation will not be appropriate for most green areas or open space and it is clear that the designation should only be used:-
- where the green space is in reasonably close proximity to the community it serves;
 - where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - where the green area concerned is local in character and not an extensive tract of land.
- 4.8. The council has used the following methodology in compliance with national policy to determine the suitability of designating land as Local Green Space.
- 4.9. Land with planning permission for development will rarely be designated as Local Green Space unless the Local Green Space can be accommodated within the site as part of the development or where the planning permission is no longer capable of being implemented. Similarly, the site should not be allocated for development in a Local Plan or Neighbourhood Plan unless the Local Green Space can be accommodated within the site as part of the development. The Local Green Space should be capable of enduring beyond the plan period.
- 4.10. A Local Green Space should meet **all** the criteria listed below:-
- The Local Green Space should be in reasonably close proximity to the community it serves, usually within easy walking distance.

- The Local Green Space should be local in character and not an extensive tract of land. Blanket designation of open countryside adjacent to settlements is not appropriate.
- 4.11. In addition, a Local Green Space must be demonstrably special and hold a particular local significance. Local Green Spaces should therefore also meet at **least one** of the following criteria and be of a particular local significance because of its:-
- Beauty – the site makes a significant visual contribution to the street scene or visual attractiveness of the area;
 - Historic significance – the site includes or provides a setting for a locally value landmark or is of cultural value;
 - Recreational value – the site is used for sport or recreation activities or used by the local community for informal recreation;
 - Tranquillity – the site provides a peaceful and tranquil space within a settlement;
 - Richness of its wildlife – this site is recognisable as a priority habitat with a reasonable species diversity or harbours priority species (listed in the UK priority habitats and species list or Kirklees Biodiversity Action Plan) and is managed to benefit the ecological interests, and:
 - Other significant community value relating to the unique and special qualities of the site, such as the role in bringing the local community together and providing community cohesion, or its role as an asset of community value.
- 4.12. The approach to Local Green Space designation has been reviewed since the draft Local Plan. Local Green Space is considered to be a high test designation which recognises sites that have unique special qualities compared to the allocation of urban green space which protects open spaces that are of public value to the local community.
- 4.13. The designation approach has been amended to ensure consistency with NPPF and soundness to more robustly and effectively reflect the aims of Local Green Space designation to protect the unique special qualities of land designated as LGS. In particular the criteria ‘other reason’ relating to the ‘demonstrably special and particular local significance’ test has been strengthened to recognise sites that have significant local community value in terms of their unique special qualities e.g. role in providing community cohesion or its status as an asset of community value.

Options to add land to or remove land from the green belt

- 4.14. Options that involved adding land to the green belt or removing land from the green belt that were not development options were assessed solely using the green belt assessment procedure which is outlined in this document. Further detail of the methodology is set out in the Green Belt Boundary Changes document.

Accept (Green)	The site could be removed from the green belt or added to the green belt without significant harm to the purposes of including land in the
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	green belt and exceptional circumstances exist that would justify the change to the green belt boundary.
Reject (Red)	The site could not be added to or removed from the green belt without causing harm to the purposes of including land in the green belt and/or no exceptional circumstances exist that would warrant such a change.

Development site options

- 4.15. Development site options considered included options for housing, employment, mixed use, sites for Travellers and mineral and waste sites. The following factors have been taken into account when making a decision to accept or reject a development site option.

Spatial Development Strategy

- 4.16. The council is committed to achieving sustainable development and where development site options fall within existing settlements in close proximity to local services and facilities and reflect the opportunities or constraints within the sub area the council has accepted the site option, subject to any technical constraints that cannot be mitigated. The council has considered all brownfield site options that have been submitted and preference has been given to the allocation of brownfield sites where these are not of high environmental value and where there are no overriding technical constraints on the site that may compromise the health and safety of future residents or users of the site. Where brownfield sites are not available suitable sites have been identified in the following order of priority:

- suitable greenfield sites within settlements (unless essential for Urban Green Space/Local Green Space or other over-riding constraints);
- sustainable extensions to settlements where exceptional circumstances can be demonstrated to release land from the green belt;
- detached green belt sites (where exceptional circumstances can be demonstrated).

Urban Green Space

- 4.17. The Local Plan has recognised the importance of green spaces within the urban area by prioritising the protection of land which performs an Urban Green Space function. Some development options overlap with sites to be considered for designation as Urban Green Space. Where this occurs, the development option has been rejected unless the assessment process for designation of the site as Urban Green Space indicates that it is no longer required as open space or does not perform an Urban Green Space function.

Flooding Sequential Test

- 4.18. The council has undertaken a sequential approach to the consideration of flood risk in the assessment of development site options. Where a site falls wholly within Flood Zone 3b (functional floodplain), it has been rejected for development. Where a site is partly within flood zone 3b an assessment has been made as to whether there is any reasonable prospect of achieving development on that part of the site not affected by the functional floodplain.
- 4.19. In the case of more vulnerable uses, any part of the site which falls within flood risk zones 3a, 3ai or 3b has been excluded from the overall development area. Where the remainder does not represent a deliverable site, the development option has been rejected. For less vulnerable end uses such as employment, a sequential approach has been taken. The flood risk sequential approach will be set out in detail in a Flood Risk Sequential Test document that will be produced before the final submission document.

Health and Safety Executive (HSE) Inner Zones

- 4.20. The Health and Safety Executive are required to be consulted on development proposals that fall within a certain distance of a hazardous installation. Health and Safety Executive zones are areas around certain factories or other installations where residents may be at risk from accidents at those facilities. These are largely chemical plants or other facilities that manufacture or store hazardous material or waste. An inner zone is an area where new residential development is not normally permitted. The capacity of new residential schemes in middle zones is also controlled, while outer zones do not normally present a constraint to development.
- 4.21. The presence of a HSE inner safety zone is considered to be an absolute constraint to development. Where an HSE inner safety zone affects part of a site, consideration will be given to whether it is possible to remove the affected area whilst retaining a reasonable development site. Where this is not possible, or the remainder of the site would fall below the site size threshold for allocation, the option has been rejected.

Assessment of Housing Capacity

- 4.22. In order for a total amount of housing capacity to be estimated, a standard development density of 35 dwellings per hectare has been applied. Analysis of new build housing in Kirklees between 2009 and 2014, on sites of at least 0.4 hectares, shows an average density of 36 dwellings per hectare. A density of 35 dwellings per hectare has been used to provide a reasonable estimate of the minimum capacity of housing sites in the publication draft Local Plan, recognising that different sites have differing characteristics. However, in accordance with policies in the publication Local Plan, there is the potential for sites in certain locations to be delivered at a higher or lower density depending on the circumstances.

- 4.23. The estimated capacity will be based on the remaining developable area of a site once any constrained area has been removed. Further details on housing capacity of sites can be found in the Housing Technical Paper.

Assessment of Employment Capacity

- 4.24. In order for a total amount of employment floorspace to be estimated, a standard ratio of area/employment type has been applied unless there is specific evidence to indicate otherwise, such as a detailed ratio in a master plan or other accompanying document or where the location or other characteristic of the individual site suggests otherwise. This calculation will result in an estimate of the amount of B1a, B1b, B1c (Office, Research and Development and Light Industry), B2 (General Industry) and B8 (Storage and Distribution) floorspace that could be achieved on the site.
- 4.25. The assumptions that have been used per site are:
- B1a = 10%
 - B1b = 10%
 - B1c = 10%
 - B2 = 60%
 - B8 = 10%

Assessment of Capacity on Mixed Use sites

- 4.26. The capacity on proposed mixed use sites will be estimated using a 50/50 ratio of housing to employment provision unless there is specific evidence to indicate otherwise, such as a detailed ratio in a master plan or other accompanying document or where the location or other characteristic of the individual site suggests otherwise. The capacity for housing and employment on each portion of the site will be calculated in the same way as for sites wholly proposed for housing or employment. In all cases the estimated capacity is based on the remaining developable area of a site once any constrained area has been removed.

Mineral Site Options

- 4.27. The Council has identified 5 categories of mineral related development which recognise the importance of providing and preserving mineral supplies.
- Mineral Safeguarded Areas – areas identified where there are known mineral resources, area protected so as to not needlessly sterilise the resource
 - Mineral Extraction Sites – new extraction sites where there are willing landowners and where there is a known viable quality and quantity
 - Preferred Areas – new areas of extraction where there is known quality and quantity but no willing landowner at the present time
 - Areas of Search – known source of mineral of interest , however no evidence on quality and quantity to make the area viable for extraction

- Mineral infrastructure safeguarded sites – provides protection for existing minerals infrastructure such as batching and processing plants but also includes former wharfages and rail spurs.
- 4.28. Further information is available on the types of mineral allocation and evidence in the Minerals Technical Paper.

Waste Options

- 4.29. The Council has identified 2 categories of waste options
- Strategic Waste Management Site – one identified in Huddersfield, large scale material recycling facility to deal with local authority collected waste
 - Safeguarded Waste Management Sites – existing sites that deal with the management of waste and have been safeguarded.
- 4.30. Further information on waste options are available in the Waste Needs Assessment: Waste Arisings and Review of Cross Boundary Movements and Waste Needs Assessment: Growth Forecasts and Assessment of Future Capacity requirements documents at www.kirklees.gov.uk/localplan.

Technical Assessment of Development Options

- 4.31. For development options, an in-depth technical appraisal of individual sites has been undertaken working with internal and external consultees to inform the assessments. Any supporting information provided by the landowner or their agent has also been considered. Consultations have taken place with:

External Consultees	Kirklees Council Consultees
• Highways England; • Historic England; • The Environment Agency; • West Yorkshire Ecology; • West Yorkshire Archaeological Advisory Service; • The Coal Authority; • National Grid; • Yorkshire Water; • Northern Gas Networks; • Northern Powergrid; • The Combined Authority; • Natural England; • Network Rail; • Clinical Commissioning Groups; • Health and Safety Executive.	• KC Highways (Strategic and Development Management); • KC Conservation & Design; • KC Environmental Protection; • KC Strategic Drainage; • KC Public Health; • KC Education.

- 4.32. Information on each site that has been assessed through the options testing procedure and has been recorded in a database. Each element of the site

assessment has been assigned a rating (red/amber/green) to summarise the perceived level of constraint. This includes an assessment of transport, flood risk and drainage, environmental health, biodiversity, historic environment, open space, education, green belt, public health and other potential constraints.

- 4.33. A decision was made as to whether the option should be accepted or rejected. This outcome has been based on the assessment of a site's physical ability to deliver development as well as its ability to deliver the council's strategy for growth. The assessment process for each topic is set out below.

Transport

- 4.34. The level of growth provided by the accepted site options throughout the plan period will have an inevitable impact upon the highway network throughout the District. The cumulative impact of all development site options has been assessed using a transport model to identify congestion 'hot spots'. The transport schemes identified in the Allocations and Designations document are designed to mitigate any adverse effects of congestion throughout the District over the plan period. The detail of the transport modelling assessment and methodology is provided in the Transport Model technical paper.
- 4.35. Each individual site option has been assessed in terms of its impact on the strategic road network (which includes the motorway network) as well as its direct impact in terms of access and highway safety upon the local road network:
- Highways England: Assessment of each site relative to its potential impact on the strategic road network in terms of congestion at motorway junctions and link roads and general traffic levels.
 - Kirklees Council Highways: Detailed assessment of the potential for the site to be safely accessed from an adopted highway and whether any additional measures would be required to achieve satisfactory access, such as the provision of sight lines or footways. Assessment also included levels of congestion at certain traffic junction hotspots throughout the District where appropriate.
 - Kirklees Council Highways: An assessment of impact on the local highway network has been carried out for individual site options. This identifies connections to the local road network, major road network and local highway junctions.

Green	Site access achievable and no significant impact on the strategic road network or local highway network
Amber	Evidence of some constraint but mitigation appears achievable and/or impact on the strategic road network or highway network requiring some degree of mitigation
Red	No current evidence that a satisfactory access could be achieved and/or significant impact on the strategic road network or highway network where mitigation cannot be programmed within the plan period.

Flood Risk and Drainage

- 4.36. The presence of flood zone 3b is considered to be an absolute constraint to development. If part of a site falls within flood zone 3b an assessment has been made to determine whether the area affected could be removed from the developable area to allow the remainder of the site to be developed, or whether the extent of the flood risk is such that it renders development on the whole site unacceptable. Where this occurs, or the remainder of the site falls below the site size threshold for allocation, the option has been rejected.
- 4.37. In the case of housing options (more vulnerable), Flood Zone 3 has been removed from the developable area in line with the sequential approach to flood risk set out above. For less vulnerable uses such as employment sites, flood risk may not be considered as an absolute constraint as long as a flood risk sequential test has been passed. Each individual site option has been assessed in terms of the percentage coverage of different flood zones within the site and an assessment of surface water drainage issues:
- Environment Agency: Percentage of the site affected by Environment Agency flood zones 1, 2, and 3.
 - Kirklees Council Strategic Drainage: Presence of main river flood zones 1, 2, 3a, 3ai and 3b (using EA Flood Map and Calder Valley Strategic Flood Risk Assessment, SFRA), assessment of the level of any constraint caused by surface water flood risk and options for surface water drainage, such as the presence of open or culverted watercourses based on recent surface water flooding events.

Green	No significant flood risk and surface water drainage can be achieved
Amber	Mitigation required, or drainage options require crossing third party land.
Red	Significant flood risk where mitigation is not viable or there is a significant surface water flooding or drainage constraint

Environmental Health

- 4.38. Any development option wholly within a HSE inner zone has been rejected. Where part of a site falls within an inner zone a judgement has been made as to whether development on the remainder of the site is achievable. Where this occurs the potential capacity on that site has been adjusted accordingly. Sites affected by middle zones may have restrictions on potential capacity, subject to more detailed assessment. The presence of outer zones is not normally a constraint to development but their presence has been noted where relevant.
- 4.39. The presence of any high pressure gas pipeline has been noted. As standoff distances are required either side of these pipelines to allow for routine maintenance (the buffer area).
- 4.40. Additional environmental factors forming part of the assessment include:

- Air Quality Management Areas (AQMA) and air quality – if a site falls within or adjacent to a designated AQMA area appropriate mitigation may be required; or where a site is located adjacent to potential sources of pollution where future users may be affected;
- Noise - consideration whether future users may be affected by existing noise sources in the immediate area or whether the development option may generate noise which would affect existing residents;
- Odour – consideration whether future users may be affected by existing odour sources or whether the development option may generate odours which would affect existing residents;
- Contamination – whether the site is affected by contamination and the level of mitigation where required.

Green	No significant constraints
Amber	Presence of constraint such as land contamination, air pollution or industrial noise but where mitigation could be achieved
Red	Serious level of constraint or multiple constraints where effective mitigation may not be possible.

Biodiversity

- 4.41. The presence of any international, national and locally designated sites relating to biodiversity or geology has been taken into account. Where a development option overlaps a designated site or lies in close proximity to a designated site, its impact has been assessed with appropriate mitigation measures considered.
- 4.42. In some cases the presence of a significant environmental feature, such as protected trees, an open watercourse or areas of ancient woodland has resulted in the rejection of a development option. In other cases it is possible to accept the development option but with a capacity adjusted to reflect the undevelopable area of the site.
- 4.43. Biodiversity and geology implications for site options have been assessed through responses from Natural England and West Yorkshire Ecology as well as consideration within the council:
- Natural England: Impacts on Special Protection Areas and Special Areas of Conservation
 - West Yorkshire Ecology: Presence of Sites of Special Scientific Interest, Local Wildlife Sites, Local Geological Sites, Habitats and Species of Principal Importance and Habitat Networks, presence of protected trees, ancient woodlands and local nature reserves. Recommendations made as to whether any area should be removed so as to avoid conflict with environmentally sensitive areas.

Green	No significant constraints
Amber	Presence of or degree of impact on environmentally sensitive areas

	where removal of an area or mitigation could reduce impact to an acceptable level
Red	Serious impact on an environmentally sensitive area

Historic Environment

- 4.44. The presence of Scheduled Ancient Monuments, Historic Parks and Gardens, Registered Battlefields, Grade I, II* and II listed buildings, Conservation Areas and designated Archaeological sites have been considered.
- 4.45. Impact on the historic environment has been assessed through responses from Historic England, West Yorkshire Archaeological Advisory Service and the Council's Conservation and Design team:
- Historic England: Presence of Historic Parks and Gardens, Scheduled Monument or Registered Battlefield, impact upon the setting of Grade I and Grade II* listed building and any loss of open area within a Conservation Area.
 - Kirklees Council Conservation and Design: Presence of Grade II listed buildings and the impact on their setting and the impact within and adjacent Conservation Areas.
 - West Yorkshire Archaeology Advisory Service: Presence or proximity of known archeologically significant sites and appropriate mitigation required.
- 4.46. Castle Hill is a nationally significant Scheduled Ancient Monument and is a prominent feature within the landscape. The impact of development on its setting has been considered and further detail can be found in the Castle Hill Setting Study. Where a site may have a negative impact on its setting, this may be a constraint to development or appropriate mitigation identified by way of a Heritage Impact Assessment. The presence of the Adwalton Moor Registered Battlefield is also considered to be an absolute constraint to development. Development options within it or in its vicinity have been rejected.

Green	No significant constraints.
Amber	Presence of or degree of impact on historic asset where mitigation could reduce impact to an acceptable level.
Red	Serious impact on an historic asset.

Open Space

- 4.47. For those development options that include an open space, sport or recreational facility as identified in the council's Open Space Study (2015) or Playing Pitch Strategy, an assessment of the impact of the development option on the open space asset has been undertaken. This considered the assessments and findings of the Open Space Study 2015 (Revised 2016), Playing Pitch Strategic Framework (2015) and the Built Leisure and Sports Facility Strategy (2015). As stated above, where there is an accepted Urban Green Space or Local Green Space option on a site, a development option on the same site has been rejected.

Green	Development of the option would not result in the loss of an important open space, sport or recreation facility.
Amber	Development would impact on an open space, sport or recreation facility that may be important in meeting local needs.
Red	Development would significantly impact on open space provision resulting in the loss of an important open space, sport or recreation facility.

Education

- 4.48. The education assessment is based on existing capacity and the trend in the need for primary and secondary provision in the school planning area within which the individual site falls (for housing or mixed use options only). It is indicative only at a given point in time, based on the council's 2014-2017 Place Planning Strategy.
- 4.49. This approach provides a basic indicative assumption for the need for school places across a particular school planning area relative to an individual option and does not consider the cumulative impacts of other Local Plan options. Detailed discussions are ongoing to assess the cumulative impact of the Local Plan on Young People and Early Years provision and school places as part of the Infrastructure Planning process. Details of this can be found in the Kirklees Local Plan Infrastructure Delivery Plan and Infrastructure Delivery Plan Addendum.

4.50.

Green	No immediate additional capacity required and a decreasing trend for places as there could be sufficient existing places to meet potential housing growth.
Amber	There is a need for additional capacity within the school planning area of either the primary or secondary school and/or the site is of a significant size.
Red	Where an option is of a size that would create a significant impact on the need for school places

Green belt

- 4.51 Development options in the green belt were assessed based on their position relative to the edge of a settlement using the outcomes of the Green Belt Edge Review as a guide, as well as for their overall impact on the purposes of including land in the green belt.

a) Green belt edge

- 4.52.1 Green Belt Edge Review: this applies to options that abut a settlement edge. No edge assessment was carried out for sites detached from the settlement edge. The methodology used to assess the edge and the outcomes are set out in the 'Green Belt Review' (November 2016) document. The assessment included the level of

constraint along the edge, such as the presence of a river or steep slope, the degree of prominence, potential for containment from the existing settlement pattern or land use features such as field boundaries, woodland or roads, or location within a strategic gap.

- 4.53 Each development option was assessed on its own merits using the edge review as a guide. The size and configuration of the option could mean that it abuts only a very small part of an edge, or that it adjoins multiple edges. The green/amber/red edge assessment for each site was therefore based on a judgement of the correct interpretation of the edge assessment as it applied directly to the site option.

<u>Green</u>	The site is located adjacent to an area of green belt edge assessed as green (a score of 1 or 2 from the green belt edge review). These areas are deemed to perform a less important green belt role where settlement extension could have limited impact on the purposes of including land in the green belt.
<u>Amber</u>	The site is located adjacent to an area of green belt edge assessed as amber (a score of 3 or 4 from the green belt edge review). These areas are deemed to perform a moderately important green belt role but where settlement extension could be achieved without fundamentally compromising the role and function of the green belt.
<u>Red</u>	The site is located adjacent to an area of green belt edge assessed as pink, red or black (a score of 5, a 'strategic green belt gap' or a 'constrained edge' from the green belt edge review). These areas are deemed to perform an important green belt role where settlement extension could impact on the role and function of the green belt, or where there are deemed to be fundamental or severe constraints to development.

b) Assessment of the impact of site options on the green belt

- 4.54 This assessment applied to all development options in the green belt. Assessment included the configuration and relationship of the site to the settlement it abuts, the degree of infill or rounding off that could be achieved and the ability of the option to present a strong new defensible green belt boundary.

Green	The site would present a reasonable extension relative to the settlement it abuts, would have little or no impact on the purposes of including land in the green belt and presents the opportunity to create a strong new defensible green belt boundary
Amber	The site is located adjacent to a part of the green belt edge where assessment has shown that development could have some detrimental impact on the purposes of including land in the green belt and/or the site does not present a strong new defensible green belt boundary. Opportunity may exist that could mitigate this impact, such as the minor alteration to the option boundary or the removal of some additional land

	from the green belt
Red	The site would not present a reasonable extension relative to the settlement it abuts and/or the site is located adjacent to a part of the green belt edge where assessment has shown that development could have a significant detrimental impact on the purposes of including land in the green belt, and/or it is located adjacent to a part of the green belt edge that is deemed to be significantly constrained and/or the option is remote from any settlement

c) Site outcome (green belt)

- 4.55 The assessment of the suitability of a site for development in terms of impact on the green belt includes both the edge assessment (referred to as 'green belt edge' in the Local Plan site information tables) and a site specific assessment (referred to as 'green belt' in the Local Plan site information tables). The 'green belt edge' assessment reflects the Green Belt Review (PDLP November 2016) and illustrates the strategic green belt role and function of land adjacent to the edge as well as indicating where green belt land is deemed to be significantly constrained. The site specific green belt assessment considers all sites, irrespective of their location relative to the edge, for the degree of impact removing the site would have on the green belt's role and function.
- 4.56 A site option may be assessed as 'Red' for the green belt edge but the option may still be acceptable if constraints could be overcome and if its extent and configuration relative to the existing settlement pattern results in an 'Amber' or 'Green' overall green belt assessment. If however a development option is assessed as 'Red' for the overall green belt assessment (regardless of the edge assessment outcome) the option has been judged to cause sufficient harm to the role and function of the green belt to justify rejection.

Public Health

- 4.57 Kirklees Public Health has provided ward data from the evidence base for the Joint Health and Wellbeing Strategy (2014-2020) regarding five indicators of public health where land use planning could have an influence.
- 4.58 These indicators are:-
- levels of obesity (adults and children)
 - physical activity levels
 - rates of emergency admission due to respiratory disease
 - rates of adults feeling lonely or isolated in the over 65's
 - rates of adults feeling lonely or isolated in the under 65's
- 4.59 Any ward within Kirklees that ranked within the top 5 on any of the above indicators or ranked within the top 5 of the Index of Multiple Deprivation has been assessed by health colleagues. These wards together with the associated public health indicators are shown in Table 7 below.

Table 7: Public Health Indicators

Ward	Levels of Obesity	Physical Activity Levels	Rates of emergency admission due to respiratory disease	Rates of adults feeling lonely or isolated
Ashbrow	Higher than the Kirklees average.			In the under 65's are higher than the Kirklees average.
Batley East			Higher than the Kirklees average.	
Batley West	Higher than the Kirklees average.			In the under 65s are higher than the Kirklees average.
Cleckheaton			Higher than the Kirklees average.	
Colne Valley		Lower than the Kirklees average.		
Crosland Moor & Netherton	Higher than the Kirklees average.			In the under and over 65s are higher than the Kirklees average.
Dalton			Higher than the Kirklees average.	In the under and over 65s are higher than the Kirklees average.
Dewsbury East	Higher than the Kirklees average.		Higher than the Kirklees average.	In the over 65s are higher than the Kirklees average.
Dewsbury West	Higher than the Kirklees average.	Lower than the Kirklees average.	The highest in the district.	In the under 65s are higher than the Kirklees average.
Heckmondwike	Higher than the Kirklees average.			
Mirfield		Lower than the Kirklees average.		
Holme Valley North		Lower than the Kirklees average.		
Holme Valley South		Lower than the Kirklees		

		average.		
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- 4.60 Recommendations have been given for mitigation, such as the provision of infrastructure to enable or encourage active travel.

Green	No significant health problems noted (option not in an affected ward)
Amber	Slight degree of health problem in the area but adequate mitigation could be achieved on site.
Red	Significant degree of health issue in the area that development may need to address.

Other Factors

- 4.61 Other potential factors have been taken into account where relevant:
- National grid: Buffer areas are required below the route of high voltage power lines. Where these occur within a site the developable area has been adjusted accordingly.
 - Coal Mining Authority: Whether the site falls within a high risk coal referral area and the presence of mine entrances have been noted.
 - Topographical constraints, ground stability/subsidence, agricultural land classification have been noted and whether the option overlaps with a mineral safeguarding area.

Green	No significant other constraints
Amber	Evidence of some constraint where there is a reasonable prospect of mitigation.
Red	Significant or severe level of constraint or multiple constraints.

Kirklees District Landscape Character Assessment 2015

- 4.62 The Council has commissioned a landscape character assessment for the district (Kirklees District Landscape Character Assessment, July 2015, Land Use Consultants). As part of the Local Plan evidence base, this has helped inform site selection and development of landscape policy PLP32 which would be a key consideration when sites are developed. The Kirklees-wide study has been supplemented by bespoke landscape character appraisal and impact work undertaken by the council for certain sites where landscape is considered to be an important consideration.

Site Option Outcomes

- 4.63 The decision whether to accept or reject each option is based on a cumulative judgement of technical assessments and consultee responses about each site.

5. SAFEGUARDED LAND

- 5.1. Where the assessment of sites has shown that sites are unlikely to deliver new homes within the Local Plan period, consideration has been given to whether there might be a reasonable prospect of such land coming forward beyond the plan period. This has taken into account relevant site constraints, relative sustainability of each option and the role and function of the green belt, where relevant. Site options rejected for development have therefore been re-assessed to determine whether the constraints may be overcome in the longer term. Where such constraints can be overcome, these sites may be identified on the Policies Map as safeguarded land to be considered for development beyond the end of the Local Plan period (i.e. land to accommodate development needs from 2031 onwards).

6. SUSTAINABILITY APPRAISAL

- 6.1. The council has commissioned an external environmental consultant to undertake a Sustainability Appraisal (SA) of the publication draft Local Plan. The SA assessment of each individual site option is based on a series of Sustainability Appraisal objectives which cover the requirements of the Strategic Environmental Assessment Directive as set out in Schedule 2 of the SEA Regulations, and also cover local issues arising through the review of local evidence. The SA objectives are set out below:

Sustainability Appraisal Objectives

1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.
2. Achieve an economy better capable of growth through increasing investment, innovation and entrepreneurship.
3. Ensure education facilities are available to all.
4. Improve the health of local people and ensure that they can access the health and social care they need.
5. Protect local amenity including avoiding noise and light pollution.
6. Retain and enhance access to local services and facilities.
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.
9. Ensure all people are able to live in a decent home which meets their needs.
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.
11. Secure the efficient and prudent use of land.
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.
13. Conserve and enhance the historic environment, heritage assets and their settings.
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.

15. Reduce air, water and soil pollution.

16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.
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17. Increase prevention, re-use, recovery and recycling of waste close to source.

18. Increase efficiency in water, energy and raw material use.
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19. Reduce the contribution that the district makes to climate change.
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- 6.2. The council has published the findings of the appraisal in the draft Local Plan Sustainability Appraisal report (October 2016, Land Use Consultants). A Sustainability Appraisal Non-Technical Summary has also been published on the council's website.

7. HABITATS REGULATIONS ASSESSMENT

- 7.1. The council is required by law to carry out a Habitats Regulations Assessment when preparing the new Local Plan. Therefore, the council has commissioned an external environmental consultant to undertake the Habitats Regulations Assessment on behalf of the council. The Kirklees Local Plan Habitats Regulations Assessment Report (November 2016 , Land Use Consultants) has been published on the council's website.