

KCS Development Ltd

Land off Meltham Road, Marsden

Outline application for erection of up to 9no. residential dwellings including associated infrastructure works. All matters reserved except for layout, landscaping and means of access from Meltham Road

Planning Statement (including Climate Change Statement)

Johnson Mowat References

Client	KCS Development Ltd
Site	Land off Meltham Road, Marsden
Development	Outline application for erection of up to gno. residential dwellings including associated infrastructure works. All matters reserved except for layout, landscaping and means of access from Meltham Road
Local Planning Authority	Kirklees Council
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Limitations

The assessments and interpretation have been made in line with legislation and guidelines in force at the time of writing, representing best practice at that time.

All of the comments and opinions contained in this report, including any conclusions, are based on the information obtained by Johnson Mowat Planning Limited during our investigations.

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- b) the date on which the final report is delivered.

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1. Introduction

- 1.1 This Planning Statement (including Climate Change Statement) is prepared on behalf of KCS Development Ltd (the Applicant) in relation to Land off Meltham Road, Marsden.
- 1.2 The purpose of the planning system is to positively promote the spatial organisation of land to achieve long-term sustainable development. In the Planning Acts , 'sustainable development' means managing the use, development and protection of land, the built environment, and natural resources in a way, or at a rate, which enables people and communities to provide their social, economic and cultural wellbeing while sustaining the potential of future generations.
- 1.3 Planning is a vital means of securing the long-term wellbeing of our communities. It enables the efficient use of resources and infrastructure, with multiple benefits to society, the environment and the economy. England is a geographically small, densely populated nation, with multiple demands on land and built environment.

The Proposal

- 1.4 The Planning Statement has been prepared in support of an Outline application for erection of up to 9 residential dwellings including associated infrastructure works. All other matters reserved except for layout, landscaping and access from Meltham Road.
- 1.5 This document should be read alongside the technical drawings and documents which comprise this planning submission. These are as follows:
- | | |
|---|----------------------------------|
| • Location Plan | 2402 PL 100 |
| • Existing Site Plan | 2402 PL 101 |
| • Proposed Site Plan | 2402 P L102 |
| • Proposed Landscape Plan | 2402 PL 105 |
| • Landscaping Specification | 2402 |
| • Proposed Site Sections (1 of 2) | 2402 PL 103 |
| • Proposed Site Sections (2 of 2) | 2402 PL 104 |
| • Proposed Density Plan | 2402 PL 106 |
| • Design and Access Statement | 2402 v3 |
| • Existing Levels (1 of 3) | EH1012-001 |
| • Existing Levels (2 of 3) | EH1012-002 |
| • Existing Levels (3 of 3) | EH1012-003 |
| • Proposed Levels | 25244-MJM-01-ZZ-DR-C-9100-S2-P01 |
| • Earthworks Volumes | 25244-MJM-01-ZZ-DR-C-9200-S2-P01 |
| • Flood Risk Assessment and Drainage Strategy | 25244-MJM-XX-XX-RP-D-5200-S2-P03 |
| • Phase 1 Desk Study Report | 26032 |
| • Transport Note | 260501 (Revision 1) |
| • EcIA and BNG Report | 424.065656.00001 |
| • BNG Statutory Metric | 260508 v1 |
- 1.6 This planning statement identifies the site location and provides a description of the site forming this outline application, outlines relevant planning history, sets out the relevant planning policy and concludes with the planning case in support of the proposed residential scheme.

2. Site Location and Characteristics

Site location

- 2.1 The application site ("the site") is located off Meltham Road on the eastern edge of Marsden, within the administrative boundary of the Kirklees Council. The surrounding area is predominantly residential, supported by local services, community facilities, and employment opportunities.
- 2.2 Marsden is identified as a District Centre in the Development Plan which has sustainable transport links via rail to Leeds, Huddersfield and Manchester. An hourly bus service runs between Meltham and Blackmoorfoot (via Slaithwaite), with bus stops located approximately 150m east and west of the proposed site access point.
- 2.3 The site contains no existing public rights of way, albeit designated footpath COL/126/130 is located adjacent the northern boundary leading to COL/126/120.
- 2.4 There are no designated heritage assets in close proximity to the site, and it is not considered that any of the buildings surrounding the site would be valued as non-designated assets.

Characteristics

- 2.5 The Site is arable land bounded by drystone walls, designated as Green Belt, adjacent to the settlement limit of Marsden Village. Agricultural land is situated to the north and east, with moorland to the south beyond Meltham Road and an existing residential property. Existing residential properties are located on the sites western boundary, with existing mature trees and boundary hedgerows situated beyond the drystone wall boundary.
- 2.6 The southern half of the site is relatively flat, albeit existing levels are raised above the road level with the boundary wall acting as a retaining wall. The gradient of the land slopes from south to north, increasing steeply towards the northern edge of the site and beyond to the valley bottom.
- 2.7 There are no watercourses or water bodies on the site. The site is located within Flood Zone 1, identified as being at a low risk of flooding from both fluvial and surface water flooding.
- 2.8 The site has no vegetation, with trees along the western boundary being located within the rear gardens of residential properties.
- 2.9 Existing electricity infrastructure crosses the site, which will be altered and routed underground as part of the development proposals.
- 2.10 With the exception of the Green Belt, the site is not located within any areas or assets listed in footnote 7 of the National Planning Policy Framework (the NPPF).

3. Proposed Development

- 3.1 The Applicant seeks outline planning approval for the erection of up to gno. residential dwellings including consideration of layout, landscaping and means of access from Meltham Road. All other matters are reserved for future approval.
- 3.2 The Proposed Development comprises the erection of gno. residential dwellings, comprising of the following housing mix:
 - 2no. two-bedroom semi-detached properties;
 - 4no. three-bedroom detached properties; and
 - 3no. four-bedroom detached properties.
- 3.3 An adoptable access road is proposed off Meltham Road, which relocates the existing drystone wall backwards into the site to allow for a pavement to be provided across the site frontage. Amenity grassland and native tree planting will be provided to the rear of a new dry stone wall, allowing for an attractive area of greenspace which allows for the land to be graded down to street-level to facilitate the access.
- 3.4 The highway is proposed to be tree-lined, with a mixture of adoptable highway and shared surfaces utilised to create a varied street scene. Turning spaces are provided throughout the site to facilitate manoeuvrability and refuse collection, with visitor parking and bin collection points also accounted for within the site layout plan. A gated access is retained at the north-western corner of the development site, providing linkages to the existing public right of way.
- 3.5 A grassland landscaped buffer is proposed at the rear of the site, which also provides the necessary space to facilitate drainage attenuation and achieve biodiversity net gain on-site. Properties are orientated to face out onto the areas of public open space, providing both amenity benefits and establishing secured by design principles at this early stage.
- 3.6 The scale and appearance of house types will be addressed at the reserved matters stage. The outline application is supported by a comprehensive Design and Access Statement, which is anticipated to establish core design principles to be considered when determining future Reserved Matters proposals.
- 3.7 The Layout Plan establishes the spatial framework for the proposed development, defining the site boundary, access points, developable areas, Public Open Space (POS), landscaping areas, tree and landscape buffers and an area of Biodiversity Net Gain (BNG).

4. Planning History

- 4.1 The site has a no planning history and has long been agricultural land within the Green Belt. Overhead powerlines cross the site, however these are not largescale pylons and will be put underground to avoid requiring stand-off distances.
- 4.2 A pre-application submission was submitted on behalf of the Applicant, for the development of the Site as applied for, on 12th December 2025. A meeting was held with Case Officer John Holmes and Highways Officer Chris Bembridge on 15th January 2026, and a written response was issued on 25th January 2026.
- 4.3 In summary, the Case Officer confirmed that the Site makes only a moderate contribution to Green Belt purposes and could potentially be regarded as 'Grey Belt'. As such, the principle of residential development was suggested to be acceptable in policy terms, subject to a detailed assessment of a future application and design considerations. It was suggested that further justification needed to be provided in relation to density, housing mix and interaction with neighbouring properties.
- 4.4 The key technical matters raised by consultees are summarised below:
- **Highways** – The proposed access works and speed survey was acceptable in principle, subject to achieving appropriate visibility splays, gradient limits, provision of a 2m footway at the site frontage and sufficient on-site parking provision.
 - **Flood Risk and Drainage** – Agreed the site is at a low risk of flooding. It was suggested infiltration would be unlikely to be suitable, and that drainage would need to be attenuated on-site and discharged to the nearest suitable outfall at a rate of 3 l/s.
 - **Ecology** – No dispute in the initial findings, however suggested these be formalised into a formal Preliminary Ecological Appraisal and Biodiversity Net Gain Assessment.
 - **Design and Layout** – Although submitted in Outline online, it was suggested the use of locally prevalent materials (stone/slate) should be committed to through indicative details in the layout and design & access statement.
 - **Amenity** – The layout should ensure adequate separation distance and compliance with Nationally Described Space Standards can be achieved.
 - **Land Quality** – A Phase 1 Contamination Risk Assessment was requested.
 - **Sustainability** – A Climate Change Statement was requested to detail measures such as energy efficient design and potential use of renewable technologies.
- 4.5 The Local Planning Authority concluded that there is potential for a residential development to be acceptable on the Site, subject to addressing the matters detailed above. It is not considered that any of the concerns raised are insurmountable, and all are addressed throughout this Planning Statement which should be read alongside the full suite of supporting technical documents.

5. Climate Change Statement

- 5.1 Sustainability is an inherent part of this development proposal, through a commitment to using high-quality design materials, sustainable measures and construction methods.
- 5.2 The principle of development is considered sustainable by virtue of its location on the edge of settlement and its proximity to existing services, facilities and public transport connections. These were matters which were considered during the pre-application process.
- 5.3 The proposed development is committed to delivering a number of sustainable principles and measures such as:
- Sustainable and best practice construction techniques will be utilised, including measures such as the local sourcing of materials from manufacturers with certified environmental management systems.
 - Implementation of robust procedures to minimise construction waste including measures to share soil and aggregate waste and reduce dust, fumes, discharge and any other form of pollution on site in line with best practice.
 - Provision of onsite POS and pedestrian links to ensure delivery of easily accessible and high-quality amenity areas and greenspace and promote healthy communities and active travel.
- 5.4 Cumulatively these measures support the intent of the recently declared 'Climate Emergency' (2019) and the Councils 2038 Carbon Neutral Vision.
- 5.5 Part L of the Building Regulations in the UK sets energy efficiency standards for new homes, requiring them to be designed and built to reduce energy consumption and carbon emissions. The updated Part L, which came into effect on June 15, 2022, mandates a 31% reduction in carbon emissions for new dwellings compared to the previous standards.
- 5.6 The Future Homes Standard will come into effect on 24th March 2027, which is the new standard for new builds in England. It aims to significantly improve energy efficiency and further reduce carbon emissions in new homes. Specifically, it mandates a 75-80% reduction in carbon emissions compared to homes built under the 2013 Building Regulations. This will be achieved through a combination of measures including low-carbon heating systems such as heat pumps and improved insulation.
- 5.7 The properties will be delivered in accordance with the relevant building regulations at the time, for the avoidance of doubt both Part L and Future Homes deliver a high standard of energy efficiency.

Climate Emergency

- 5.8 Kirklees Council declared a Climate Emergency in 2019 on the basis that urgent action is required to improve and protect the environment. A Climate Change Action Plan has been adopted to present how the district of Kirklees can achieve its ambition to be Net Zero and Climate Ready by 2038.

2038 Carbon Neutral Vision

- 5.9 Kirklees Council are aiming to be completely carbon neutral by 2038.
- 5.10 In this context carbon emissions from human activities in Kirklees will need to be dramatically reduced to zero with any remaining emissions safely removed from the atmosphere. This has also been referred to as achieving 'net zero' carbon emissions by 2038. In order to meet the Carbon Neutral Vision the Council will: -
- Set a Carbon Budget
 - Increase the Amount of Electric Charging Points
 - Allow Low Emission Cars to Park for Free
 - Add more Electric Vehicles to the Council's Fleet
 - Environmental Impacts Considered in All Decisions

- Plant More Trees
 - Create a Climate Commission and Green Charter
 - Host a Youth Summit
 - Increase Recycling Rates
 - Develop a Programme and Action Plan
- 5.11 The Applicant is dedicated to taking pro-active measures to reduce the consumption of energy and natural resources and thus helping mitigate climate change. Electric Vehicle Charging points are to be provided for every proposed dwelling, further looking to mitigate the impacts of climate change.
- 5.12 All measures proposed will assist in reducing Climate Change and are also supported by a willingness to introduce meaningful tree planting and opportunities for biodiversity net gain across the Site.

7. Statutory Policy Context and Other Relevant Policies

7.1 The whole purpose of the planning system is to enable the development of appropriate sites which are sustainable, as defined at paragraph 8 of the NPPF.

7.2 The duty of Section 38(6) of the Planning and Compulsory Purchase Act 2004 (the Act) enshrines in statute the primacy of the Development Plan. Section 38(6) of the Act states:

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise."

7.3 Paragraph 2 of the NPPF recognises the provision of Section 38(6) of the Act stating:

"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework (NPPF) must be taken into account when preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements."

7.4 The correct approach to determining whether a proposal complies with a development plan is uncontroversial: -

- All the relevant policies should be identified;
- An assessment should be made as whether the proposal complies or not with each of those policies and the weight to be given to these;
- The development plan must be read as a whole;
- It must be recognised that separate policies within the same development plan can pull in different directions; and
- A development can conflict with one individual policy and still comply with the development plan as a whole.

7.5 Section 39 of the Act requires decision makers to exercise their functions with the objective of contributing towards the achievement of sustainable development.

7.6 The reason for a decision must be intelligible and they must be adequate. They must enable the reader to understand why the matter was decided as it was and what conclusions were reached on the principle important controversial issues, disclosing how any issue of law or fact was resolved¹.

7.7 The development plan for this residential development comprises the Kirklees Local Plan, which was adopted on 27th February 2019.

7.8 National Planning Policy Guidance is provided by "the NPPF". National policy is a factor that is required, as a matter of law, to be taken into account. It is recognised that the above two documents comprising the Development Plan were adopted prior to the recently updated 2024 NPPF.

Local Planning Policy

Kirklees Local Plan

7.9 The site is not allocated for any specific land-use in the Local Plan and is on land designated as Green Belt. Accordingly, the following adopted policies are applicable to this proposal:

- LP1 – Presumption in favour of sustainable development
- LP2 – Place shaping
- LP3 – Location of new development

¹ [2017] EWHC 664 (Admin)

- LP7 – Efficient and effective use of land and buildings
- LP11 – Housing Mix and Affordable Housing
- LP21 – Highways and access
- LP22 – Parking
- LP24 – Design
- LP28 – Drainage
- LP30 – Biodiversity and geodiversity
- LP33 – Trees
- LP51 – Protection and improvement of local air quality
- LP52 – Protection and improvement of environmental quality

National Planning Policy

National Planning Policy Framework

- 7.10 The latest version of the NPPF was published on 12th December 2024 and forms the relevant policy guidance at the national level for the determination of all planning applications. The NPPF is a material consideration which must be taken into account in all planning decisions.
- 7.11 Paragraph 2 of the NPPF states: -
- "Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements."*
- 7.12 There are three objectives (Para 8) of sustainable development comprising the **economic, social and environmental** roles.
- 7.13 Paragraph 10 sets out that at the heart of the NPPF is a presumption in favour of sustainable development.
- 7.14 So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 11 of the NPPF identifies how this presumption is to be applied in making decisions on individual applications stating:
- "For decision-taking this means:*
- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or*
- ii. any adverse impacts of doing so will significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination."*
- 7.15 Beyond Chapter 4 of the NPPF there are 13 topic areas (as well as Annex 1 and 2) which form the NPPF document; those topic areas considered of relevance to this planning application are set out below:

- Chapter 2: Achieving sustainable development;
- Chapter 4: Decision-making;
- Chapter 5: Delivering a sufficient supply of homes;
- Chapter 8: Promoting healthy and safe communities;
- Chapter 9: Promoting sustainable transport;
- Chapter 11: Making effective of land;
- Chapter 13: Protecting Green Belt land;
- Chapter 14: Meeting the challenge of climate change, flooding and coastal change; and
- Chapter 15: Conserving and enhancing the natural environment.

Other Material Considerations

Planning Practice Guidance (March 2014)

- 7.16 The National Planning Practice Guidance (PPG) was published as a live 'working' document on 6th March 2014. The PPG forms the Government's guidance into specific categories relating to different aspects of the planning system.

Supplementary Planning Documents

- 7.17 Supplementary Planning Documents (SPDS) in Kirklees relevant to this application includes:

- Highways Design Guide Supplementary Planning Document (2019)
- Housebuilders Design Guide SPD (2021)
- Kirklees Waste Management Design Guide (2020)
- Biodiversity Net Gain in Kirklees Technical Advice Note (2021)
- Planning Applications Climate Change Guidance (2021)
- West Yorkshire Low Emissions Strategy and Air Quality and Emissions Technical Planning Guidance (2016)

Emerging Local Plan

- 7.18 The Emerging Local Plan remain at the earliest stage of development, currently proceeding with early engagement and evidence-gathering. The site has been put forward for consideration as part of the Call for Sites process.
- 7.19 The latest Local Plan Update, presented to Cabinet on 24th March 2026, suggested submission of the plan for examination isn't expected until late-2028. In line with paragraph 49 of the NPPF, given that the plan is still at the earliest stage of preparation only very limited can be afforded to it in decision making.
- 7.20 In this context, it is considered that weight should continue to be afforded to the policies of the adopted Local Plan (2019) in accordance with the degree of conformity with the NPPF.

Housing Land Supply

- 7.21 The Council's latest housing land supply position (May 2025) confirms a land supply of 3.96 years and the 2024 Housing Delivery Test result was 54%. The implications of this in relation to this development proposal are discussed in more depth in the planning assessment chapter of this report.
- 7.22 The national context is of an objective of significantly boosting the supply of homes as set out in the NPPF. In this case there is an unquestionably urgent need to identify land in Kirklees to provide for essential market and affordable housing and the obvious solution is deliver these homes on peripheral greenfield (including Green Belt) sites.

8. Planning Assessment

- 8.1 This section outlines the key planning considerations and provides an assessment of the planning merits of the proposed development.

Principle of Development

- 8.2 The Local Plan for the Kirklees District was adopted in 2019 and pre-dates the NPPF. Paragraph 232 of the NPPF requires that in such circumstances due weight should be given to existing policies in accordance with their degree of consistency with the NPPF.
- 8.3 Section 19 of the Local Plan deals with new development in the Green Belt. The policy seeks to restrict new development in the Green Belt other than for agriculture and forestry, essential facilities for outdoor sport and outdoor recreation, cemeteries, or for other land which preserve the openness of the Green Belt, and which do not conflict with the purposes of including land in it.
- 8.4 The Kirklees Local Plan is inconsistent with the provisions of the NPPF in that the latter allows for a greater number of exceptions of inappropriate development within paragraph 154 and, within paragraphs 155 and 156, provided circumstances where land within the Green Belt can be classified as Grey Belt where, subject to meeting specific criteria, new development of homes, commercial and other development should not be regarded as inappropriate.
- 8.5 Accordingly, Section 19 of the Local Plan is inconsistent with the expanded exceptions to inappropriate development provided by paragraphs 154, 155 and 156 of the NPPF. For this reason, these policies are only afforded limited weight, and the application is assessed with reference to the NPPF.

Green Belt Policy

- 8.6 The site is located entirely within the Green Belt as defined on the Local Plan Policies Map.
- 8.7 Paragraph 155 of the NPPF sets out circumstances under which the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate.
- 8.8 To benefit from the provisions of paragraph 155 the site must consist of 'grey belt' land. Annex 2 of the NPPF defines grey belt as:

"Land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development."

Green Belt Assessment

- 8.9 The Green Belt section of the PPG has been updated to explain how to assess Green Belt to identify Grey Belt land and how to deal with proposals on Grey Belt land. The 'Making effective use of land' section has also been updated to explain how to apply paragraph 125c (substantial weight to brownfield land proposals) of the NPPF to decision making.
- 8.10 The updated PPG states that "where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land. Such decisions should also be informed by an overall application of the relevant policies in the NPPF."
- 8.11 With regard to proposals on Grey Belt land the PPG states *"an assessment of Green Belt will (alongside other considerations) inform the determination of applications which involve reaching a judgement as to whether proposals utilise grey belt land and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area"*. It adds that *"Where grey belt*

sites are not identified in existing plans or Green Belt assessments, it is expected that authorities should consider evidence, in light of this guidance, on whether the site strongly contributes to the Green Belt purposes a, b or d, whether the application of policies to areas and assets of particular importance identified in footnote 7 to the NPPF (other than Green Belt) provide a strong reason to restrict development, and whether development of the site would fundamentally undermine the purposes of the remaining Green Belt across the plan area, as set out in national policy and this guidance".

- 8.12 When it comes to determining in what circumstances proposals on grey belt land should be approved the PPG states "where a site is judged to be grey belt, and to not fundamentally undermine the purposes of the remaining Green Belt across the plan area if released or developed, wider considerations will still be relevant to the consideration of development proposals on the site. These would include determining whether the development would not be inappropriate development in the Green Belt, as set out in paragraph 155 of the NPPF. That question would include consideration of whether a development is sustainably located, whether it would meet the 'Golden Rules' contributions (where applicable), and whether there is a demonstrable unmet need for the type of development proposed."

Grey Belt Tests

- 8.13 The first stage of fulfilling paragraph 155 is a Green Belt contribution assessment which requires consideration of the site against purposes (a) (b) and (d) of the Green Belt. The second stage requires an assessment of whether the site would impact on any of the protected areas highlighted in Footnote 7 of the NPPF, other than Green Belt, and would this provide a strong reason for refusing development.

Does Green Belt land on the site strongly contribute to Green Belt purposes a), b) or d)?

- 8.14 The contribution of the site to each of the purposes is considered as follows:

a. to check the unrestricted sprawl of large built-up areas

- 8.15 The PPG confirms that this purpose relates to the sprawl of large built up area, and villages (such as Marsden) should not be considered as large built up areas. The land is well contained by existing boundary treatment, and its development would not lead to a sprawl of any large built-up area. The site has physical features that restrict and contain the development (i.e. residential properties west, with road infrastructure to the south, and dry stone walls to the east and north which will be supplemented by a landscape buffer). In accordance with the PPG, it is assessed that the Site therefore makes only a **weak contribution** to this Green Belt purpose.

b. to prevent neighbouring towns merging into one another

- 8.16 The PPG confirms that this purpose relates to the merging of towns, not villages. As discussed, the Site is situated on the edge of a village and the nearest neighbouring settlement to the east is also a village (Slaithwaite). As such it is considered that the Site makes **no contribution** to this Green Belt purpose in accordance with the PPG.

d. to preserve the setting and special character of historic towns

- 8.17 The PPG confirms that this purposes only relates to historic towns, not villages. The Local Plan does not explicitly recognise 'historic towns' within the plan area, therefore it is not considered necessary to undertake a detailed assessment against this purpose. In any instance, the site doesn't form part of the setting of a historic town and has no visual, physical, or experiential connection to the historic aspects of a historic town. As such, the Site makes **no contribution** to this Green Belt purpose.

Would the application of non-Green Belt NPPF footnote 7 policies provide a strong reason for refusing development?

- 8.18 The non Green Belt policies referred to within footnote 7 which are applicable to this application are those relating to habitat sites, designated sites of Special Scientific Interest and heritage assets.

- 8.19 The site is located within the 2km of the South Pennine Moors SPA/SAC/SSSI. The application is supported by a Preliminary Ecological Appraisal that considers the site to not provide foraging habitat for qualifying species of the SPA due to the small scale of the site, nature of surrounding uses and likely high levels of disturbance associated. This was agreed with the Local Authority Ecologist during the pre-application enquiry process.
- 8.20 In respect of heritage assets, there are no designated assets, or other heritage assets of archaeological interest within the site boundary and the site is not located within the setting of any designated heritage assets.
- 8.21 The development would not contravene the applicable policies within the NPPF in respect of habitat sites, designated sites of Special Scientific Interest or heritage assets and therefore the application of the non-green belt policies within footnote 7 would not provide a strong reason for refusing development.

Appropriateness Tests

- 8.22 As justified by the Council's own Green Belt assessment, the site does not contribute strongly to purposes *a)*, *b)*, or *d)* of the Green Belt and the application of the applicable, non-green belt, policies contained within footnote 7 would not provide a strong reason for refusing development. The site is considered to constitute Grey Belt land.
- 8.23 Having concluded that the site is Grey Belt land it is necessary to consider the appropriateness of the development in respect of the following:

Would the proposed development on grey belt fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan?

- 8.24 The site has a gross site area of 0.6Ha. The site is considered to form a very limited proportion of what is an extensive Green Belt across the Kirklees District. The development of the site is therefore not considered to fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, particularly considering the land forms a modest extension of existing residential development.

Is there a demonstrable unmet need for the type of development proposed?

- 8.25 The NPPF informs that in the case of application involving the provision of housing, a demonstrable unmet need means the lack of a five-year supply of deliverable housing sites, including the relevant buffer where applicable, or where the Housing Delivery Test was below 75% of the housing requirement over the previous three years. The Council's latest housing land supply position confirms a land supply of 3.96 years and the 2023 Housing Delivery Test result was 54%. The authority is substantially below the required threshold in respect of housing land supply and the delivery, as such there is a demonstrable unmet need for the type of development proposed.

Would the development in the grey belt be in a sustainable location?

- 8.26 The site is situated within a 1km walking catchment of the majority of Marsden, a recognised District Centre, offering access to a broad range of local amenities and services, including but not limited to:
- Marsden Junior School;
 - Marsden Infant School;
 - Marsden Health Centre;
 - Post Office;
 - Convenience Shops;
 - Cafés and Bakeries;
 - Pubs and Restaurants;
 - Small Business and Local Trades;

- Community Sports Facilities;
- Marsden Mechanics Community Facility;
- Independent High Street Shops; and
- Co-working Office Facilities.

- 8.27 The site also benefits from excellent access to the local bus network along the B6107, these stops provide services to Marsden and Black Moorfoot on an hourly basis. Marsden Railway Station provide regular services to Leeds, York and Manchester Picadilly.
- 8.28 The proposed development would integrate with the surrounding footpath network, ensuring users are not disturbed as a result of the development proposal. The Landscape Masterplan includes a footpath link at the north west corner of the site, designed to connect with existing Public Rights of Way along the northern boundary.
- 8.29 In terms of pedestrian infrastructure, footways and street lighting are provided on the north of Meltham Road (B6107) and the proposal will secure an extension of this adoptable footway along the site boundary. This footway leads all the way to Marsden Centre, with a zebra crossing accessible across Manchester Road (A62).
- 8.30 The site is considered to occupy a sustainable location, with access to local amenities and services achievable on foot or by bicycle, and with public transport connections facilitating travel to larger settlements without reliance on private vehicles.
- 8.31 The site is considered to occupy a sustainable location having regard for paragraphs 110 and 115 of the NPPF and the sustainable travel expectations of Policy LP20.

Does the proposal include major development involving housing?

- 8.32 The NPPF defines major development for housing as a development where 10 or more homes will be provided. Consequently, the 'Golden Rules' contributions referenced in paragraph 156 of the NPPF are not applicable to this proposal.

Green Belt Conclusion

- 8.33 The site does not contribute strongly to purposes *a), b) or d)* of the Green Belt the application of policies relating to the protected areas identified within footnote 7 of the NPPF would not provide a strong reason for refusing the development. Accordingly, the site is considered to constitute grey belt land.
- 8.34 The PPG re-enforces footnote 55 of the Framework which sets out the development of Grey Belt land is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.
- 8.35 The development would not fundamentally undermine the purposes, taken together, of the remaining Green Belt across the area of the plan. There is a demonstrable unmet need for housing in Kirklees and the development occupies a sustainable location adjacent to the edge of the existing boundary of Marsden where there are amenities and services within walking distance and public transport connections to access facilities and services further afield. The proposal is for minor housing development and therefore the 'Golden Rules' contributions are applicable in this instance.
- 8.36 The proposed development meets the requirement of paragraph 155 of the NPPF and accordingly it should not be regarded as inappropriate development within the Green Belt. The principle of residential development is therefore considered to be acceptable.

Presumption in favour of sustainable development

- 8.37 At the heart of the NPPF is the presumption in favour of sustainable development, which should be at the heart of plan-making and decision-making². This is the overarching consideration laid out in Government policy.
- 8.38 The NPPF confirms the presumption in favour of sustainable development applies when determining development including applications for market and affordable housing development.
- 8.39 There are three dimensions to sustainable development: economic, social and environmental³. Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 8.40 The consideration of where a development proposal represents sustainable development is a question unaffected by whether it accords with policies in an up-to-date Development Plan. The determination of whether a proposal represents sustainable development is a planning judgment based upon criteria set out in the NPPF.
- 8.41 In making the planning balance, the NPPF does not indicate that any one element should represent a trump card⁴. However equally that does not mean that proposal has to pass all three of the sustainability tests to be acceptable and that any of the three roles can act as a trump card against the development. The NPPF is clear, economic, social and environmental gains should be sought jointly and simultaneously through the planning system.
- 8.42 It is rare for any development to have no adverse impacts; on balance many fail one of the roles. For the assessment of sustainability to have any meaning then, all of the competing considerations have to be assessed together, and an overall balanced conclusion reached.
- 8.43 Whilst the starting point for decision making is the development plan, the presumption in favour of sustainable development applies and feeds into the planning balance. Consequently, it is necessary to consider the proposals against the three dimensions of sustainable development.

Economic Role

- 8.44 The economic role of sustainable development contributes to building a strong, responsive and competitive economy ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and also by identifying and coordinating development requirements including the provision of infrastructure.
- 8.45 It is useful to identify the economic contribution of construction in terms of both direct impacts (through developers themselves and their contractors) and indirect impacts (from other sectors and firms that rely on development and its supply chains and spending). The benefits are broadly categorised (all are relevant) as: -
- Capital Investment and Expenditure Benefits;
 - Construction Benefits;
 - Direct Employment Benefits;
 - Indirect and Induced Employment Benefits;
 - Custom Expenditure Benefits;
 - Public Finances;
 - Local Authority Revenue Benefits;

² Framework – paragraph 10

³ Framework – paragraph 8

⁴ Appeal Ref: APP/N1350/A/14/2217552 – Land off Sadberge Road, Middleton St George, Darlington – paragraph 70

- Local Community Benefits; and
- Other “Softer” Benefits.

8.46 When quantitative and qualitative benefits are considered in tandem, the wider economic benefits are as follows: -

Development as a Driver of Economic Growth

8.47 Improving the long-term competitiveness of the UK economy, including through its significant network of supply chains and contracting relationships.

Delivering “Real” Jobs and Economic Value

8.48 Construction is a major source of national employment, with construction supporting more jobs compared with investment in many other sectors of the economy. The construction industry provides a crucial labour entry point for young, lower skilled workers and those moving out of unemployment.

Sector Skills and Employability

8.49 The construction industry offers a range of opportunities across different trades and skill sets from bricklaying and carpentry through to plumbing and maintenance. Apprenticeship opportunities are particularly prevalent and have increasing over recent years.

Enhancing Place Competitiveness and Local Economic Development

8.50 The proposals will create competitiveness within the construction industry, and it will be the intention to use local suppliers. This is considered important for an area to remain competitive and attractive to business and economic activity, which in turn will drive the economic growth the country needs.

Social Role

8.51 The social role of sustainable development supports strong, vibrant and healthy communities by providing residential accommodation required to meet the needs of present and future generations. It also involves creating a high-quality built environment, with accessible local services that reflect the community’s needs and support health, social and cultural well-being. The application proposal will result in a range of social benefits through the delivery of much needed housing.

Density

8.52 Policy LP7 of the Local Plan requires developers to make the best and most efficient use of land by delivering the highest possible number of dwellings, whilst also ensuring a well-designed layout that responds appropriately to the site’s characteristics, its context, and the type and size of housing proposed. Residential schemes are generally expected to achieve a density of 35 dwellings per hectare against the net developable area (i.e. excluding landscape buffers and drainage infrastructure).

8.53 No definition of developable area is provided within the NPPF, however the RICS land measurement for planning and development purposes defines net developable area as “*the area of land available for public and private buildings, and ancillary servicing space, after the public realm area (such as open space and major roads) has been identified for planning purposes*”. The supporting Density Plan identifies a developable area of 0.41Ha, due to land take required for biodiversity net gain, access grading, landscape buffers and open space, therefore achieving a net density of 22 dwellings per hectare.

8.54 Within the developable area the requirement to deliver street trees, visitor parking and pavements continues to impact deliverable density. The proposed development delivers 10% biodiversity net gain, the minimum policy requirement, any further reduction in landscaped areas would impact the ability to achieve this on-site.

8.55 It is recognised that Policy LP7 allows for lower densities where it is necessary to ensure the development is compatible with its surroundings, development viability would be compromised, or to secure particular house types to meet local housing needs.

- 8.56 The adjacent housing estate, comprising of properties along Gatehead Bank and those fronting Meltham Road, achieves a density of 21 dwellings per hectare (31 dwellings within 1.5Ha). This is demonstrated within Figure 8.1 below. These surrounding developments therefore establish a clear local density context, with a notable absence of development to the north and east, where open fields prevail.

Figure 8.1 Local Density Context



- 8.57 The surrounding densities reflect the sites position as a minor development parcel on the edge of the settlement, which does not form part of a dense urban environment and instead occupies a transitional semi-rural location characterised by relatively low-density development. This context is a key material consideration in determining an appropriate and policy-compliant form of development.
- 8.58 With regards to achieving appropriate densities, Paragraph 129 of the NPPF directs that clearly identifies the *"need for different types of housing.. and availability of land, the desirability of maintaining an area's prevailing character..., and securing well-designed, attractive and healthy places"*. The proposal aligns with these objectives, it responds sensitively to the site's semi-rural context, contributes to the supply of housing, and utilises available land in a manner consistent with its surroundings. The final design, to be secured at Reserved Matters stage, will ensure a high-quality and attractive development.
- 8.59 In this context, it is considered that the proposed development complies with the expectations of Policy LP7 of the Local Plan and Paragraph 129 of the NPPF.

Housing Mix and Design Quality

- 8.60 Policy LP11 of the Local Plan seeks to ensure that a mix of housing suitable for different household types which reflect changes in household composition in Kirklees in the types of dwelling they provide, taking into account the latest evidence of the need for different types of housing. The Affordable Housing and Housing Mix SPD supports the Council in applying Policy LP11, where it is clear that housing shares set out for the regions of the district should only be applied to major developments.

- 8.61 For a minor development site, the proposals provide a broad mix of residential properties comprising of 2-bedroom semi-detached dwellings, 3-bedroom detached and 4-bedroom detached. This ensures a variety of choice within the market, allowing for an attractive development that is reflective of the neighbouring character. The final detail of scale and appearance of house types are to be considered as part of a future reserved matters application in any instance. Subject to the securing of a detailed house types at the reserved matters stage the development is considered to accord with the requirements of policy LP11 of the Local Plan.
- 8.62 Policy LP24 (design) requires that all new housing developments should be high quality and achieve good design. The Housebuilder Design Guide SPD provides detailed guidance on how this can be achieved.
- 8.63 The policy advises that the Council will encourage new development to achieve high sustainable design and construction standards. The minimum acceptable sustainable housing standards are set out in the Building Regulations and the development will be required to accord with the aforementioned standards.
- 8.64 The proposed layout provides private outdoor space for homes, these are of a suitable size to ensure that an adequate level of outdoor amenity space can be provided. Plots also are designed to provide adequate storage for bins, recycling and bicycles, with the facilities located or designed in a way that is convenient for residents and supports the quality of the street scene. The detailed house type design will form the subject of future reserved matters consideration but the submitted layout plan demonstrates that the residential areas are of a suitable size to ensure that dwellings will meet the nationally described space standards, and that adequate provision can be made for refuse and bicycle storage.
- 8.65 Whilst the detailed house types will be confirmed as part of a future reserved matters application, the proposed layout demonstrates a residential development on a site of this size can meet the design standards required by policy LP24 of the Local Plan and the Housebuilder Design Guide SPD .

Environmental Role

- 8.66 The environmental dimension of sustainable development is concerned with protecting and enhancing our natural, built and historic environment. This aspect of sustainable development for this proposal is supported by the following drawings and documents:
- Flood Risk Assessment and Drainage Strategy;
 - Stage 1 Geo-environmental Desk Study Report;
 - Landscape Plan;
 - Transport Statement;
 - Ecological Impact Assessment; and
 - Biodiversity Impact Assessment.

Flood Risk and Drainage

- 8.67 Policy LP27 (flood risk) directs development to areas with the lowest probability of flooding, following a sequential risk based approach. Policy LP28 (drainage) provides a presumption of use of Sustainable Urban Drainage Systems, ensuring that typical greenfield run-off rates are not exceeded. There is a general presumption against the pumping of surface water within the district.
- 8.68 A Flood Risk Assessment and Drainage Strategy has been prepared by MJM Consulting Engineers. The assessment has been undertaken in accordance with the chapter 14 of the NPPF, associated PPG on Flood Risk and Coastal Change and Kirklees's Strategic Flood Risk Assessment.
- 8.69 The site is in an area identified as having a low probability of flooding on the EA Flood Map and is located in Flood Zone 1 for both fluvial and surface water flood risk. The development of residential housing, which is classed as a more vulnerable use, is compatible with the site in Flood Zone 1.

- 8.70 A pre-application response from the LLFA has confirmed that soakaways or infiltration systems are not possible at this site as it is too steep and can risk reemergence and water around the foundations. Furthermore, officers indicated that a suitable location for discharging surface water would be a watercourse on Hey Heads Farm via the existing Public Right of Way to the north of the site.
- 8.71 Following the preliminary assessment of the 1:100 year plus 45% for climate change storm event, and based on a 3l/s discharge rate, the on-site attenuation requirements will be in the order of 174m³. This is situated within the open space to the north of the site. The development proposals are in accordance with both National and Local Policy and Guidance relating to Flood Risk and Surface Water Management.
- 8.72 The proposed foul water drainage from the new development will ultimately be discharged into the existing combined sewer within Gate Head via gravity following the PROW track to the north of the site.
- 8.73 Subject to appropriately worded conditions, the development is considered to accord with the requirements of policy LP27 and LP28 of the Local Plan.

Land Contamination

- 8.74 Policy LP53 (contaminated and unstable land) requires that proposals for development of land which may be contaminated or unstable must incorporate appropriate investigation into the quality of the land. Where there is evidence of contamination or instability, remedial measures must be identified to ensure that the development will not pose a risk to human health, public safety, and the environment.
- 8.75 A Phase I Geo-Environmental Desk Study Assessment has been prepared by Ground Investigation Associates. The key findings are summarised below.
- 8.76 The site is indicated to be immediately underlain by bedrock strata comprising the Midgley Grit (sandstone) in the northern half of the site and the Marsden Formation (mudstone and siltstone) across the southern half of the site. Significant thicknesses of Made Ground are not anticipated across the site based on the desk study information.
- 8.77 No historical coal mining or other significant quarrying related issues have been identified at the site by the desk study works undertaken. No specific investigation or mitigation in relation to mining risks are therefore considered to be necessary.
- 8.78 The desk study works have revealed the absence of any recorded significant industrial legacy associated with the site and the wider surrounding area. Significant widespread chemical contamination of the in-situ soils is therefore not anticipated based on our current understanding of the site's geo-environmental setting.
- 8.79 Table 8 of the Phase 1 Geo-Environmental Desk Study provides a recommendation of further works to address the key geotechnical, environmental and development issues identified at the site by the desk study works. Subject to appropriately worded conditions, the proposal development is considered to accord with Policy EN8 of the CS.

Landscape

- 8.80 Policy LP32 (landscape) of the Local Plan requires development proposals to be designed to take into account and seek to enhance the landscape character of the area, in particular the setting of settlements and buildings within the landscape.
- 8.81 Whilst it is acknowledged that the development will have a landscape impact, particularly in relation to short-range views, it is considered that the development is capable of assimilating into the landscape over time.
- 8.82 The supporting landscaping plan provides an attractive site frontage, with amenity grassland and 3no. heavy standard trees alongside an area of scrub to the south east corner all set behind a drystone wall

at the rear of the proposed footpath. Within the site the proposed development secures tree-lined streets with the provision of 7no. street-trees within the open space land with management to be secured via a management company.

- 8.83 The rear of the site provides a acid soils grass mixtures, with a mown edge at the rear of the private drive, and 4no. heavy standard trees planted throughout the open space. A waters edge meadow mixture grassland surrounds the attenuation basin, with the open space being utilised as a landscape buffer and accommodation for the drainage infrastructure.
- 8.84 The existing boundary dry stone walls are to be retained, rebuilt and gapped up where necessary. Native species hedging is provided to the rear of the dry stone wall in selected locations at the site frontage. Retaining walls are utilised at rear gardens to address the levels constraints of the site, as detailed on the supporting engineering plans.
- 8.85 It is considered the significant benefits which this development provides outweigh the short-term landscape harms associated. The proposals therefore comply with policy LP32 and paragraph 187 of the NPPF.

Highways matters

- 8.86 Paragraph 155 of the NPPF requires that in assessing planning applications it should be ensured that:
- Sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;
 - Safe and suitable access can be achieved to the site for all users;
 - The design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code 48; and
 - Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach.
- 8.87 Paragraph 116 of the NPPF makes clear that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.
- 8.88 At the local level the objective of the NPPF are reflected in the Transport and Movement policies of the adopted Local Plan and guidance of the Highways Design Guide SPD. Specifically, policy LP21 (highways and access) sets out how proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users. New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.
- 8.89 Optima have prepared a Transport Note based on the development proposals. The following summarises the key points:
- The proposed development has been assessed for residential development. The site fully accords with both national and local transport policy;
 - Future residents of the development would have the opportunity to travel for all key journey purposes by modes other than the private car, including walking, cycling and public transport;
 - The site access and internal road layout has been designed in accordance with the relevant Kirklees Council and Manual for Streets standards;
 - The development proposals are anticipated to generate 6 two-way trips in the AM peak hour and 5 two-way trips in the PM peak hour; and
 - Car parking and cycle parking will be provided to meet Kirklees Council standards.

- 8.90 It is concluded that the proposals would not result in an unacceptable impact on highway safety, nor any severe cumulative impacts on the local road network, and as such are in accordance with the requirements of the NPPF. The development is therefore considered to accord with paragraph 115 of the NPPF and the objectives of policy LP21 of the Local Plan.

Ecology

- 8.91 The Application is supported by an Ecological Impact Assessment and Biodiversity Net Gain Assessment which demonstrates compliance with Local and National Policy expectations with regards to impact on habitats and biodiversity. The proposed development will incorporate necessary mitigation measures and deliver measurable biodiversity enhancement and Biodiversity Net Gain.
- 8.92 At the national level, the scheme aligns with the requirements of the Environment Act 2021 and reflected within the NPPF. The EclA confirms that the development will avoid significant adverse effects on biodiversity, including internationally designated sites such as the South Pennine Moors Special Protection Area and South Pennine Moors Special Area of Conservation, with the report concluding that effects on these sites will be negligible due to the Site's existing urban edge context and limited ecological suitability for qualifying bird species.
- 8.93 The development also satisfies the statutory requirement to deliver at least 10% Biodiversity Net Gain. The submitted Statutory Biodiversity Metric demonstrates a habitat unit increase from 1.32 baseline units to 1.51 post-development units, equating to a net gain of 10.81%, alongside the creation of 0.73 hedgerow units. No off-site compensation is required because the mandatory BNG target is exceeded entirely on-site.
- 8.94 The proposals respond positively to Kirklees Council Local Plan Policy LP30 (Biodiversity and Geodiversity) by avoiding significant biodiversity harm, protecting ecological features, and incorporating enhancement measures including native tree planting, species-rich hedgerows, wildflower grassland creation, mixed scrub planting, bat and bird boxes, and hedgehog highways. These measures contribute to habitat connectivity and ecological enhancement in accordance with the policy objectives.
- 8.95 The development also accords with Policy LP31 (Strategic Green Infrastructure Network) through the integration of green infrastructure within the layout, including Public Open Space, sustainable drainage features, native planting, and ecological corridors that strengthen local habitat connectivity.
- 8.96 Compliance with Policy LP33 (Trees) is demonstrated through the retention of the Site's boundary features and the planting of 14 new trees, including native species and fruit trees, which will enhance landscape character and ecological value.
- 8.97 Overall, the EclA concludes that, with the implementation of the recommended mitigation and enhancement measures, the development will result in no significant adverse ecological effects and will deliver a policy-compliant biodiversity enhancement and measurable net gain for biodiversity.

Planning Balance Summary

- 8.98 The NPPF requires the local planning authority to undertake a simple planning balance exercise to establish whether the adverse impacts of the development significantly and demonstrably outweigh the benefits.
- 8.99 This planning statement has identified a number of benefits associated with the proposal. The list below summaries the benefits and attributes weight to each matter: -

Benefits

- Significant weight to compliance with the provisions of paragraph 155 of the NPPF;
- Significant weight to the delivery of market housing in the context of no five year-housing land supply on a site which is in a highly sustainable location;

- Significant weight to the development of a small-medium sized windfall site to be built out quickly by an SME developer;
- Significant weight to the ecological measures within the scheme which would result in significant positive benefits at a local level; and
- Moderate weight should be afforded to the economic benefits of the proposal.

Identified harm

- 8.100 Having regard for **1)** the policy case presented above **2)** the mitigation measures set out in supporting technical document and **3)** the security provided through the imposition of suitably worded planning conditions (which can request the provision of additional information at pre and post commencement stages) no harm is identified in this case. The landscape harms would be short-term only, and assimilate with the existing built edge of the settlement over time.
- 8.101 Accordingly, there are no adverse impacts that would significantly and demonstrably outweigh the benefits of delivering market dwellings. The balance is therefore firmly in favour of a grant of planning permission.

9. Summary and Conclusion

- 9.1 This planning statement is submitted to support an outline application for residential development including associated infrastructure works. All matters are reserved except for layout, landscaping and means of access from Meltham Road.
- 9.2 This planning statement has demonstrated that the principle of development is acceptable and that there are no insurmountable technical issues that would prevent the site coming forward for residential development.
- 9.3 As agreed through the pre-application and presented within this Planning Statement, the site does not contribute strongly contribute to purposes *a)*, *b)*, or *d)* of the Green Belt and the application of the applicable, non-green belt, policies contained within footnote 7 would not provide a strong reason for refusing development. The site is considered to constitute to Grey Belt land.
- 9.4 The scheme would provide several economic, social and environmental benefits which all contribute towards achieving sustainable development, in accordance with local and national planning policies.
- 9.5 This planning statement, together with the accompanying plans and technical documents demonstrate that the proposal is compliant with the relevant policies contained within the Local Plan (when read as a whole).
- 9.6 In the context of just 3.96 years' worth of deliverable supply, the NPPF's tilted balance is engaged and as demonstrated in the planning balance sub-section of this report, there are no harms identified as a result of the proposals which would significantly and demonstrably outweigh the benefits. This, in accordance with paragraph 11c and 11d of the NPPF, planning permission should be approved without delay.

