

MATTER 30 - HUDDERSFIELD1 HOUSING ALLOCATIONS: GREEN BELT RELEASES

Site H660 – land east of Netherton Moor Road, Netherton

Issue - Are the proposed Green Belt release housing allocations in the Huddersfield Sub-Area justified, effective, developable/deliverable and in line with national policy?

1 Introduction

1.1 The allocation of Site H660 for residential development [as currently proposed](#) is not sound as it is neither justified nor is it consistent with either the emerging Policies in the Local Plan or with national policy guidance.

1.2 Paragraph 126 of the NPPF sets out a requirement for Local Plans to conserve heritage assets in a manner appropriate to their significance. When considering the impact of a proposed development upon the significance of a designated heritage asset, Paragraph 132 of the NPPF makes it clear that great weight should be given to the asset's conservation and explains that significance can be harmed by development within its setting. This site lies some 330 metres from the edge of the Honley Conservation Area. The loss of this site and its subsequent development could harm elements which contribute to its significance.

1.3 At present, the extent of the area proposed for developed coupled with the lack of any specific measures within the Plan to ensure that any development will take place in a manner consistent with the conservation of the Conservation Area could result in a form development which would harm elements which contribute to its significance.

1.4 Consequently, the allocation of Site H660 for residential development [as proposed in the Submission Local Plan](#) would be in conflict with the following aspects of the emerging Local Plan:-

- The Spatial Vision – in that it conflicts with the intention that development will take place in a sustainable way (balancing economic, social and environmental priorities), that the local character and distinctiveness of

Kirklees and its places will be retained, or that the natural, built and historic environment will be maintained and enhanced through high quality, inclusive design

- Spatial Objective 8 - in that it will not protect or enhance the characteristics of the historic environment
- Policy PLP35 – in that it will not conserve elements which contribute to the significance of a designated heritage asset.

1.5 It would also be contrary to national policy guidance as set out in the NPPF insofar as it would not:-

- Help to deliver a “*positive strategy for the conservation and enjoyment of the historic environment*” as is required by NPPF Paragraph 126.
- Contribute to protecting or enhancing the historic environment. Therefore, it will not deliver sustainable development in terms of the conservation of the historic environment [NPPF Paragraph 7].
- Conserve heritage assets in a manner appropriate to their significance. Therefore it will runs contrary to one of the Government’s Core Planning Principles [NPPF Paragraph 17].
- Give great weight to the conservation of the area’s designated heritage assets [NPPF, Paragraph 132].
- Provide clear and convincing justification for the harm that it would cause to the historic environment [NPPF, Paragraph 134].

2 Response to the Inspector’s questions

Question a) Has the impact of the proposal on heritage assets been adequately assessed and addressed? Should protection and mitigation measures linked to the Heritage Impact Assessment (LE78) be specified in the Plan?

2.1 [On the whole, we would broadly support the methodology that has been used for the Heritage Impact Assessment of this site.](#) The Heritage Impact Assessment has identified the elements which contribute to the significance of the Conservation Area and has set out a good evaluation of the contribution which this site makes to its setting. The Heritage Impact Assessment concludes that that the open land adjacent to the boundary of the Honley Conservation Area contributes highly to its significance [Paragraph 4.8]. We would concur with that evaluation. However, it is unclear how the proposed mitigation measures could

effectively reduce the harm which the development of this site would cause to the setting of the Conservation Area.

- 2.2 The existing housing in Netherton (immediately to the north of Site H660) is clearly visible from Sandbeds at the northern edge of the Honley Conservation Area. The development of Site H660, as currently proposed, would significantly reduce the gap between the built-up area of Netherton and the Conservation Area to just 300 metres. Because of the relative levels of the allocated site to the Conservation Area, housing on this site is likely to be particularly prominent from this part of the Conservation Area. Consequently, the loss of Site H606 and its subsequent development seems likely to erode the open rural character of this area and that this would result in harm to the setting of the Conservation Area. Given, that the loss of this area would harm an element which contributes to the significance of the Conservation Area, it is unclear how any development which brought the edge of the built-up area of Netherton closer to Honley Wood Conservation Area could be achieved in a manner consistent with the conservation of the Conservation Area and are not convinced that the form of development being proposed in Paragraph 5.3 would effectively reduce the harm to an acceptable level

3 Conclusions

- 3.1 The Heritage Impact Assessment has identified that the open area between Netherton and Honley contributes highly to the significance of the Honley Conservation Area. The loss of this area, therefore, would be likely to result in harm to the setting of the Conservation Area. However, it is unclear how any development which brought the edge of the built-up area of Netherton closer to Honley Wood Conservation Area could be achieved in a manner consistent with the conservation of the Conservation Area and are not convinced that the form of development being proposed in Paragraph 5.3 would effectively reduce the harm to an acceptable level. In terms of NPPF Paragraph 134, this is likely to constitute less than substantial harm to the significance of these designated heritage assets. Whilst the degree of harm may be less than substantial, nevertheless, it **would** still **be** causing harm to a number of designated heritage assets. As such, therefore, it **would** not **be** delivering sustainable development in terms of protecting and enhancing the historic environment, **it would** conflicts with **one of** the Government's Core Planning Principles (that heritage assets should be conserved in a manner appropriate to their significance), nor would it

be likely to provide the positive strategy for the conservation of the historic environment that is required for Local Plans.

4 Suggested Change

4.1 It is recommended that:-

Either

(a) Site H660 is deleted,

or

(b) The developable area of Site H660 is reduced in size to that which would safeguard the setting of the Honley Conservation Area, and

(c) The amount of housing specified in Part 2 of the Local Plan for Site H623 is amended accordingly, and

(d) The Heritage Impact Assessment is amended to specify the measures necessary to safeguard the setting of the Honley Conservation Area and that these Recommendations are securely tied into the Policy framework of the Local Plan