

## **Kirklees Local Plan Examination**

### **Stage 4 hearings Other Site Allocations**

#### **KIRKLEES RURAL SUB-AREA (Matter 44)**

#### **MATTERS, ISSUES AND QUESTIONS (MIQs)**

##### **Council Response**

##### **Matter 44 – Holme Valley South allocations**

- 1.1 This statement sets out the council's responses in relation to the Inspector's matters and issues Matter 44. All the documents referred to in this statement are referenced within the main body of the statement.
- 1.2 The modifications proposed in this document have been provided to assist with the discussions at the hearings for this matter and have not been subject to sustainability appraisal testing or public consultation. Should it be necessary to make any of the modifications these will be added to the full schedule of modifications to the Local Plan which will be made available for comment and subject to sustainability appraisal at a later stage of the Examination in Public, subject to the delegated powers agreed by the council's Cabinet.
- 1.3 The following table (table 1) sets out the response to each question against the site reference.

***Issue – Are the proposed employment, housing, mixed-use and safeguarded land allocations in Holme Valley South justified, effective, developable/deliverable and in line with national policy?***

**Table 1: Matter 44 - Holme Valley South allocations:**

<u>Holmfirth area</u>	a) Is the site suitable for the proposed use? In the case of housing and mixed-use allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure? For mixed use sites - how was the mix/ proportion of uses determined?	c) Is the site available and deliverable in the timescales envisaged <sup>1</sup> ?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
E1871 – land north-east of Bottoms Mills Woodhead Road, Holmfirth (3,920 m2)	<p>This site is proposed as an accepted employment allocation and has been assessed in accordance with Local Plan Methodology Part 2: Site allocation methodology (BP23). It is an existing UDP Business and Industry allocation and is located adjacent to an existing locally significant area of business and industry (PEA site KR11).</p> <p>The plan provides clear guidance on the requirements and constraints on page 18 of the Allocations and Designations document (SD2). None of these are considered as significant</p>	<p>An indicative capacity is provided (3,920 sq. m); this capacity is based on a net site area taking into account a non-developable area adjacent to Malkin House Wood which is a Local Wildlife Site.</p> <p>The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber ‘Translating</p>	<p>This site was promoted by the landowner through the Council’s Call for Sites exercise, as such this site is considered as available and deliverable in the timescales envisaged. The Kirklees Market Strength Assessment (LE11) has also assessed this site as likely to be attractive to the market with no significant constraints (page 198) and is considered to be delivered in the immediate to short term (up to 5 years).</p>	N/A

<sup>1</sup> For housing allocations - as set out in the Council’s housing trajectory in the updated Housing Supply Topic Paper (December 2017) (EX30.2). For safeguarded land – at 2031 and beyond.

	<p>and all could be addressed as part of a detailed planning application. The reports that maybe required to accompany the submission of a planning application have also been listed. Mitigation measures are also specified.</p> <p>Part of the site falls within Flood Zone 3b, 3a and 2. The area within Flood Zone 3b has been removed from the developable area. A flood risk sequential test, site-specific Flood Risk Assessment and appropriate mitigation would be required. The Flood Risk Technical Paper (BP24) sets out the Local Plan sequential test.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p><b>Proposed modification: - Add Transport Assessment to the site box reports required.</b></p>	<p>Jobs into Land' study by Roger Tym &amp; Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.</p> <p>The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.</p>		
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<p>H47 – land south of Vicarage Meadows, Cinderhills, Holmfirth (14 dwellings)</p>	<p>This site has been assessed as suitable for housing using the Local Plan site allocations methodology. This full site has a reserved matters planning permission (2016/93458, approved March 2017). This site is under construction.</p> <p><b>Proposed modification: - Add Transport Assessment to the site box reports required.</b></p>	<p>No constraints were identified which would result in a reduction to the developable area of this site. The indicative site capacity is therefore appropriate taking account of the site constraints and provision of the necessary infrastructure.</p>	<p>The site is available as demonstrated by the planning application from Orion Homes.</p> <p>The site is deliverable and is phased to start in 2018/19 in accordance with the standard phasing approach set out in EX30.2. As the site has now started this phasing is justified and may even show some delivery earlier than anticipated.</p>	<p>N/A</p>
<p>H50 – Bridge Mills, New Road, Holmfirth (45 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including the provision of a pedestrian footway, potential surface water issues, culvert, noise source, potentially contaminated land and presence of Habitat of Principal Importance on part of this site.</p> <p>The pedestrian footway is already present in this case, the noise source is the adjacent road which can be mitigated through design. The site meets the culvert at the existing access point therefore does not impact on access. The Habitat of Principal Importance has been removed from the site area. The reference to contaminated land results from the use of the site as a</p>	<p>The developable area of this site has been reduced to remove the woodland in the western area of this site has been identified as a Habitat of Principal by West Yorkshire Ecology. No further constraints have been identified which would impact on the developable area. The indicative capacity based on the developable area is appropriate based on the approach set out in EX30.2.</p>	<p>This site is available as shown by the Call for Sites submission (most recently from the landowner in 2016) which indicates that the site should be considered for housing and would be available in 5-10 years.</p> <p>This site is phased to deliver new homes from 2022/23 which takes account of the timescales submitted through the Call for Sites process. The site availability information and constraints information demonstrates that this site can be delivered in the timescales envisaged.</p>	<p>N/A</p>

	<p>mill so remediation may be required.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Design &amp; Access Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>			
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**H50 – Bridge Mills, New Road, Holmfirth**

i) Is the loss of active employment use on the site justified? What are the plans for the relocation of the businesses?

The council has received information from the landowner indicating that this site is available for housing within 5-10 years to allow time for the existing businesses to relocate. As such the site has been assessed as a housing option in the Local Plan. NPPF paragraph 22 states that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purpose. In this case, the landowner has indicated the site will no longer be available for an employment use therefore in accordance with NPPF the potential for alternative uses has been explored through the Local Plan assessment of this housing option.

In relation to the re-location of the businesses, there is general churn within the employment capacity which enables businesses to move to alternative premises. There is evidence of vacancy within the Priority Employment Areas, of which there are two within the immediate economic market area (KR10 and KR30). Site KR10 also provides the opportunity for a degree of new build where a total of 0.48 hectares has been identified (SD1, page 57). The council also provide support to businesses looking to re-locate through engagement with officers in Economic Development and through the council's online Business Hub ([www.kirkleesbusinesshub.com](http://www.kirkleesbusinesshub.com)). The Business Hub is an online register of all employment land and property available for sale within Kirklees and Economic Development officers would assist businesses through this process.

ii) What key buildings/features are to be retained on the site?

There are no listed buildings on this site and the site is not within a conservation area. The site allocations box does not specify the retention of the existing buildings on this site as this would be unduly restrictive. This would allow the complete re-development of this site for housing but also the conversion of the mill to residential (which could increase the site capacity) in addition to some new build housing. Any development on the site would have to have regard to Local Plan policies PLP7 in relation to making efficient use of previously developed land in sustainable locations and PLP24 (re-use and adaptation of existing buildings) and PLP35 (Historic Environment).

<p>H130 – land west of St. Mary’s Rise and St. Mary’s Way, Netherthong (21 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints and the relevant reports required to address the constraints including surface water issues, listed buildings and conservation area close to the site and potential impact of topography.</p> <p>A surface water interceptor drain may be required on the northern boundary. Although there are listed buildings and the Oldfield Conservation Area to the north of this site, the land on falls away to H130. The indicative capacity has taken account of the planning permission capacity for the southern part of the site (2014/92737) where the topography is most challenging in relation to the existing dwellings.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p><b>Proposed modification: Add Transport Statement to the site box reports required.</b></p>	<p>The developable area of this site has been reduced to remove the protected trees in the western part of this site. No further constraints have been identified which would impact on the developable area.</p> <p>The indicative capacity is appropriate based on the developable area and taking account of the planning permission capacity on the southern part of this site. A planning application has recently been submitted for 21 dwellings (2018/90192).</p>	<p>This site is available as shown by the Call for Sites submission and the planning permission on part of this site (2014/92737). A planning application has recently been submitted for the whole of this site (2018/90192).</p> <p>The site is phased to deliver homes from 2019/20 which is appropriate as the site is deliverable as shown by the constraints and availability information.</p>	<p>N/A</p>
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<p>H214 – land north-west of New Mill Road, Thongsbridge (15 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraint that this land may be potentially contaminated and as such a contamination report will be required.</p> <p>The western part of this site has planning permission 2005/90322 (erection of 9 town houses) which has an implemented access road and more recently permission has been granted for two dwellings within that original planning permission area (2008/94148, granted 03/02/17).</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Design &amp; Access Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>	<p>The developable area of this site has been reduced to remove the central part of this site which has topography constraints. The remaining capacity is appropriate based on the approach set out in EX30.2.</p>	<p>This site is available as shown by the Call for Sites submission.</p> <p>The site is deliverable and is phased to deliver homes from 2018/19 which is appropriate on the basis of limited site constraints identified, planning permission and availability of the site.</p>	<p>N/A</p>
<p>H284 – land east of Holme View Avenue and Peninne Close, Upperthong (27 dwellings)</p>	<p>This site has been assessed as suitable for housing using the Local Plan site allocations methodology. This site was granted planning permission (2013/93879) and is largely built out.</p>	<p>The capacity of this site (27 dwellings) is based on the planning permission (2013/93879) and the scheme for 27 dwellings is under construction.</p>	<p>The site is available as demonstrated by the planning application from Conroy Brook (Developments) Ltd and that the site is now under construction. The remaining delivery is expected to complete in 2017/18 which accords with the standard build rates set out in EX30.2.</p>	<p>N/A</p>

<p>H294 – land east of St. Mary’s Avenue, Netherthong (32 dwellings)</p>	<p>This site has been assessed as suitable for housing using the Local Plan site allocations methodology. The site box requires the consideration of a noise source near the site and the impacts on the conservation area. This site was granted planning permission (2016/93365) and is now under construction.</p>	<p>No constraints were identified which would result in a reduction to the developable area of this site. The indicative site capacity is therefore appropriate taking account of the site constraints and provision of the necessary infrastructure.</p>	<p>The site is available as demonstrated by the planning application from Jones Homes (Yorkshire) Limited.</p> <p>This site has been phased to deliver homes from 2018/19 which is justified as this site is now under construction.</p>	<p>N/A</p>
<p>H715 – land west of Wesley Avenue, Netherthong (43 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including limited surface water drainage options and the proximity of the site to the Netherthong / Deanhouse Conservation Area. The relevant associated reports are also listed.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Design &amp; Access Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>Although there may be a small amount of third party land required for the drainage solution the site abuts the highway so a connection to the</p>	<p>No constraints have been identified which would result in a reduced developable area. The boundary wall and slope referred to in the Heritage Impact Assessment are mostly outside of the site boundary but those within the boundary could be retained as part of the site layout. As such the indicative site capacity is justified.</p>	<p>This site is available as shown by the Call for Sites submission which covers the majority of this site. There is a reasonable prospect that the remainder of this land will become available.</p> <p>The site is phased to deliver homes during the latter part of 2019/20 which is appropriate in accordance with the approach set out in EX30.2.</p>	<p>N/A</p>



	<p>combined public sewer (Miry Lane) to the north of this site can be achieved.</p> <p>A site specific Heritage Impact Assessment (LE82) identifies the majority of this site to have slight significance to the adjacent conservation area whilst the north-eastern area has moderate significance. Mitigation includes retaining the boundary wall and gradients to the north of the site. In the context of this assessment the allocation remains justified. As such Policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE82 a reference document at the time of the determination of the planning application.</p>			
<p>H727a – land west of Miry Lane, Thongsbridge (39 dwellings) (part Green Belt release)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including third party land required for visibility splays, sewer across the site and surface water drainage.</p> <p>The southern part of the site has been granted outline planning permission (including consideration of access) which provides suitable access. The presence of a sewer crossing the northern part of the site can be incorporated into the site</p>	<p>The indicative site capacity is appropriate as the developable area has been reduced to remove priority habitat woodland. The indicative capacity is based on the approach set out in EX30.2.</p>	<p>This site has been tested as a Local Plan option as it was Provisional Open Land in the UDP. This site is available as shown by the Call for Sites submission which covers the majority of this site. The area not subject to a Call for Sites form has been removed from the developable area due to the presence of priority habitat.</p> <p>The southern part of the site has outline planning permission 2014/93593 and a full</p>	<p>A triangle of land in the north-western part of this site is within the green belt. Most of the site is currently allocated as Provisional Open Land in the UDP.</p> <p>The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional</p>

	<p>layout. The development of this site would be considered in the context of the drainage requirements of Policy PLP28 (SD1).</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Design &amp; Access Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>		<p>application has recently been submitted 2017/92567 by a housebuilder (Nicholas Ryan Projects Ltd).</p> <p>The site is deliverable and is phased to deliver homes from 2019/20 in the context of the outline planning application and the approach set out in EX30.2.</p>	<p>circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.</p>
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**H727a – land west of Miry Lane, Thongsbridge**

i) Are protective measures required, linked to the proximity of the cricket ground?

There is a cricket ground to the north-west of this site. The council have received no objections to this site from Sport England and the council do not have the evidence to support the requirement for protective measures. The requirements for such protective measures would be considered through the planning applications process which makes provision for comments from the cricket club, cricket governing body and Sport England.

<p>H728 – land west of Stoney Bank Lane, Thongsbridge (53 dwellings)</p>	<p>This site has been assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The high flood risk areas have been removed from the developable area. The site allocations box provides sufficient information including highlighting biodiversity and potential contamination issues and states that no development will take place in flood zone 3 (also the biodiversity area). This site was granted outline planning permission (2014/93248, December 2015) and is currently subject to two reserved matters applications (2017/93053 and 2017/93609, both Redrow Homes).</p> <p><b>Proposed modification:</b></p> <p><b>Add Transport Statement to the site box reports required.</b></p>	<p>The capacity in EX30.2 reflected the capacity on indicative plans submitted with the outline planning application and is therefore justified as the achievable capacity on this site given the sloping nature of the site as well as the area of woodland and flood zone 3 which have been removed from the developable area. There is a reserved matters planning application on this site but this has yet to be determined.</p>	<p>The site is available as demonstrated by the reserved matters planning applications (2017/93053 and 2017/93609) from Redrow Homes.</p> <p>The phasing of this site to deliver homes from 2018/19 is justified in accordance with the phasing procedure set out in EX30.2 which takes into account the submission of a reserved matters planning application.</p>	<p>N/A</p>
<p>H729 – land at Tenter Hill Road, New Mill, Holmfirth (81 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including third party land required for access, public right of way and limited surface water drainage options.</p> <p>The site access constraint was resolved through the planning permission 2015/90811 (under construction) which also provides access to the remaining part of the</p>	<p>No constraints were identified which would result in a reduction to the developable area of this site. The indicative site capacity is therefore appropriate taking account of the site constraints and provision of the necessary infrastructure.</p> <p>The capacity is justified</p>	<p>This site is available as shown by the Call for Sites submission and the council-owned part of this site is available (the central section).</p> <p>This site delivered some homes in 2015/16 but commenced full delivery from 2016/17 which is an appropriate timescale considering the planning permission. The remainder of the site is also deliverable.</p>	<p>N/A</p>

	<p>allocation. This planning permission also includes an access road across the public right of way (Tenter Hill Road).</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>The development of this site would be considered in the context of the drainage requirements of Policy PLP28 (SD1).</p>	<p>as it has taken into account the planning permission capacity (2015/90811, under construction) and applies the approach set out in EX30.2 to the remainder of the site.</p>		
<p><b>H729 – land at Tenter Hill Road, New Mill, Holmfirth</b></p>				
<p>i) <u>How will the PROW through the site be dealt with? Are there implications for delivery of units on the western part of the site?</u></p> <p>The main access to the site has now been implemented as part of the planning permission for the eastern part of this allocation (2015/90811) which is largely built out. This access road crosses the bridleway (Tenter Hill Road) and allows access to the adjacent land in the central part of this allocation without further impacting on the PROW. The western part of the allocation as this would include crossing a further public right of way (Sycamore Lane) but there is a reasonable prospect that a similar solution could be found through either re-routing the PROW or by the access road crossing the PROW in the same way as occurred for the eastern part of this site.</p>				
<p>H730 – land west of Royds Avenue, New Mill, Holmfirth (74 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including improvements to the local highway network, presence of a culverted watercourse and the</p>	<p>The indicative capacity is appropriate as the developable area has been reduced to take account of a small area of allotments within the site. There are some</p>	<p>This site has been tested as a Local Plan option as it was Provisional Open Land in the UDP. There is a reasonable prospect that this site will become available during the plan period. This site is</p>	<p>N/A</p>

	<p>proximity to a conservation area. The route of the watercourse would require further investigation but could be incorporated into the layout of the site. High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>As the protected trees are on the northern and western site boundaries, their protection can be secured through the layout of the site.</p> <p>Reference to listed buildings near to the site and the presence of some protected trees on the north and western site boundaries should be listed as constraints. A site specific Heritage Impact Assessment (LE83) has been undertaken for H730 and identifies the majority of this site as slight significance to heritage assets. The area of the site immediately adjoining Kirkroyds Lane has been assessed as having moderate significance and the north-west corner of the site has been assessed as having high significance. As there are protected trees in the high significance and moderate</p>	<p>protected trees immediately bordering Little Lane and Kirkroyd Lane which would also need to be accommodated within the layout of any proposals. The indicative capacity has been calculated from the developable area in accordance with the approach in EX30.2.</p>	<p>developable and taking account of the availability it has been phased in EX30.02 to deliver homes from 2027/28.</p>	
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	<p>significance these will be retained and the site layout can mitigate impacts. In the context of this assessment the allocation remains justified. As such Policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE83 a reference document at the time of the determination of the planning application.</p> <p><b>Proposed modification:</b></p> <p><b>Add to constraints:</b></p> <ul style="list-style-type: none"> <li>• <b>Presence of protected trees along part of the site boundary</b></li> <li>• <b>Site is close to Listed Buildings</b></li> </ul> <p><b>Add to reports required:</b></p> <ul style="list-style-type: none"> <li>• <b>Drainage report</b></li> </ul>			
<p>H787 – land south of former Midlothian Garage, New Mill Road, Holmfirth (12 dwellings)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including limited surface water drainage options and potentially contaminated land. The relevant reports are listed.</p> <p>The development of this site would be considered in the context of the drainage requirements of Policy PLP28 (SD1).</p>	<p>No constraints have been identified which would result in a reduced developable area on this site. The indicative capacity is therefore appropriate based on this area following the approach set out in EX30.2.</p>	<p>This site has been tested as a Local Plan option as it was a housing allocation in the UDP. There is a reasonable prospect that this site will be available during the plan period. There was an outline planning permission for housing on the central part of the site which recently expired.</p> <p>This site has been phased as delivering homes from 2019/20 however as there is no current</p>	<p>N/A</p>

	High level site access and local highway constraints have been considered within the context of the site capacity. The Design & Access Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.		call for sites submission on this site, the delivery of homes may occur later than expected.  <b>Proposed modification:</b>  <b>Amend phasing of this site to deliver homes in 2027/28.</b>	
H2587 – former Midlothian Garage, New Mill Road, Holmfirth (56 dwellings)	This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including a public right of way along the western boundary of the site, surface water issues, potentially contaminated land, noise sources and biodiversity. Such constraints have been overcome as outline planning permission has now been granted on this site (2015/93824).	The indicative capacity of this site is appropriate as it is based on the capacity of the outline planning permission which takes account of the on-site constraints.  The net site area for this site requires amendment to remove the areas of trees which are Habitats of Principal Importance. This removes 0.42ha from the developable area which reduces to 2.02ha but does not affect the site capacity which is based on the planning permission.  <b>Proposed modification:</b>  <b>Reduce developable area by 0.42ha to take account of the presence of Habitats of</b>	This site is available as shown by the planning permission (2015/93824) on this site.  This site is deliverable and constraints have been overcome to secure outline planning permission. This site is phased to deliver homes from 2019/20 which is appropriate considering the outline planning permission and in accordance with the phasing approach in EX30.2.	N/A

		<b>Principal Importance. There is no impact on site capacity as this is based on the approved planning application.</b>		
SL2187 – Robert Lane and Bill Lane, Wooldale	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case insufficient evidence exists at the plan making stage to determine whether development here would have significant impacts on heritage assets.</p>	No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.	<p>This site is available as shown by the Call for Sites submission.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031.</p>	N/A
SL2189 – north of Holme Valley Memorial Hospital, Huddersfield Road, Thongsbridge	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land. There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints</p>	No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.	<p>This site is available as shown by the Call for Sites submissions.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031.</p>	N/A



	can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available.			
SL2191 - Cliff Lane, Holmfirth	This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land. There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available and further consideration of the scale of development in relation to the local road network.	No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.	This site has been tested as a Local Plan option as it was Provisional Open Land in the UDP. There is a reasonable prospect that this site will be available beyond 2031.  There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031	N/A
<b>SL2191 - Cliff Lane, Holmfirth</b>				
i) <u>What scale of development could be accommodated on the local highways network in this locality?</u>				
SL2191 is 6.26 ha in size. The Council would expect around 200 units to come forward from a site of this size, although the topography may reduce this somewhat. Local surveys undertaken of housing sites in the vicinity show that a peak of two way vehicular trips of 160 could be expected to be generated from this site. From that it would be realistic to expect 128 movements from the site and 32 movements moving into the site				

Road widths in the vicinity of the site are as follows:

- Town End Road is circa 7m wide with intermittent footways;
- Cliff Road is circa 5m wide with no footways; and
- Cliff Lane is circa 4.5-5m wide with no footways.

Parts of Cliff Lane and Cliff Road are within the allocation so there is scope to improve the highway at this point, however there is approximately 250m of Cliff Road that will remain around 5m wide. There are certain areas where the highway could be widened between 0.1m and 1m, but this will only mean that the highway will be 6m wide at certain places.

There is a potential route out along Cliff Road to the north bringing vehicles out at junction with Town End Road. This junction looks to have sub-standard visibility to the right, obscured by a third party dwelling and to the left by third party land.

Whilst it is accepted that the local highway network will not necessarily be able to accommodate the full site build-out of 200 units, it is questionable whether the site topography will permit that level of build out.

It is therefore considered that there is a reasonable prospect that post-plan period the site will be able to accommodate a reduced level of units using Cliff Road although an exact figure cannot at this moment be attached without a fuller assessment.

<u>Holmbridge</u>	a) Is the site suitable for the proposed use? In the case of housing and mixed-use allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure? For mixed use sites - how was the mix/ proportion of uses determined?	c) Is the site available and deliverable in the timescales envisaged <sup>2</sup> ?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
H626 – land west of Bankfield Drive (23 dwellings)	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including the proximity to the SPA/SAC and Local Wildlife Site.</p> <p>In accordance with the Habitats Regulation Assessment, a modification has been proposed to the H626 site box (as set out in SD4, reference AD-MM46).</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>	No constraints have been identified which would result in a reduced developable area. The indicative site capacity is therefore appropriate based on the approach set out in EX30.2.	<p>This site is available as shown by the Call for Sites submission.</p> <p>The site is phased to deliver dwellings later in 2019/20 which is appropriate when considering the constraints on this site and that the site is available. The phasing is in accordance with the approach set out in EX30.2.</p>	N/A

<sup>2</sup> For housing allocations - as set out in the Council's housing trajectory in the updated Housing Supply Topic Paper (December 2017) (EX30.2). For safeguarded land – at 2031 and beyond.

	<p>There is an error in this site allocations box as there is a public right of way to the south of this site to this site rather than through the site.</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Modify constraints: <i>Public right of way <del>crosses the</del> to the south of this site</i></b></li> <li>• <b>Add Transport Statement to the reports required.</b></li> </ul>			
<p>H2585 – land south of Water Street (19 dwellings) (part Green Belt release)</p>	<p>This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including that the site is unsuitable for greater capacity than 19 dwellings, flood risk, potentially contaminated land, proximity to the SPA/SAC, biodiversity and heritage considerations.</p> <p>This has an extant planning permission (2010/91518) for 19 dwellings.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p>	<p>A significant proportion of this site has been removed from the developable area due to flood risk. The indicative site capacity is based on the previous planning permission as highways have indicated no further intensification of use above that previously consented is considered appropriate for this site. The site capacity is therefore appropriate.</p>	<p>This site is available as shown by the planning permission (2010/91518) and recent correspondence with the site promoter.</p> <p>The site has been phased to deliver homes from 2020/21 which is appropriate as this site has an extant planning permission.</p>	<p>A small part of this site is currently within the green belt.</p> <p>The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for housing in the district. After due consideration of all relevant non-green belt alternatives, the need to promote sustainable</p>

	<p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add Transport Statement to the reports required</b></li> </ul>			development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating housing development on the site outweigh the loss of this part of the green belt.
SL2331 – east of Kilnhouse Bank Farm, Dobb Top Road	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land may need to be acquired which is not currently available and further consideration of the scale of development in relation to the local road network.</p>	<p>No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.</p>	<p>This site is available as shown by the Call for Sites submission.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031.</p>	N/A

**H626 – land west of Bankfield Drive, Holmbridge**  
**SL2331 – east of Kilnhouse Bank Farm, Dobb Top Road, Holmbridge**

- i) Is there capacity in the local highway network or potential to provide highway improvements in the locality to support the development of site H626 singularly, or in combination with site SL2331?

H626 is 0.66 Ha in size, and has an indicative capacity of 23 dwellings. This would produce around 18 two way trips in the am peak which is seen as an acceptable increase in trips for the local highway network. SL2331 is 1.17 Ha in size and has an indicative capacity of circa 40 dwellings, producing around 30 two way trips.

Having one access for both sites would result in circa 50 trips through Laithe Avenue/Dobb Top Road. There is limited potential to provide substantial highway improvements along Dobb Top Road. They have a combined frontage onto Dobb Top Road of circa 100m. Dobb Top Road is around 5m in width with no footways provided.

The local highway network was considered to be unsuitable for the proposed intensification of use at the time of this assessment in the absence of any evidence of mitigation measures. SL2331 is therefore not deliverable or developable during the local plan period but there is a reasonable prospect that the constraints on this site could be overcome to allow the delivery of new homes beyond the end of the local plan period. When considering this land as safeguarded land through the UDP process, the UDP Inspector’s report stated “*The deficiencies are not so serious as to preclude the potential for development which could be linked to necessary highway improvements, and are not a good reason to reject allocation as POL.*”

<p>SL2166 – south-east of Dobb Lane, Hinchcliffe Mill</p>	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case</p>	<p>No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.</p>	<p>This site is available as shown by the Call for Sites submission.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031.</p>	<p>N/A</p>
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	third party land would need to be acquired which is not currently available and further consideration of the scale of development in relation to the local road network.			
<b>SL2166 – south-east of Dobb Lane, Hinchcliffe Mill, Holmbridge</b>				
<p>i) <u>Is there capacity in the local highway network or potential to provide highway improvements in the locality to support the development of the site?</u></p> <p>SL2166 is 1.61 ha in size The Council would expect around 56 units to come forward from a site of this size, although the topography may reduce this somewhat. Local surveys undertaken of housing sites in the vicinity show that a peak am two way vehicular trips of 45 could be expected to be generated from this site. From that it would be realistic to expect 36 movements from the site and 9 movements moving into the site.</p> <p>Dobb Lane varies in width between 3.5m and almost 5m. The Accepted site options Technical Appraisal (BP 29 in the Local Plan Examination Library) states: “High retaining wall on site frontage could impact on the achievement of required visibility splays. Poor highway network unsuited to any intensification of use at this point”</p> <p>There is a reasonable prospect that the visibility splays could be overcome if the site is developed, but it is noted that it may take a large amount of earthwork removal to facilitate this. A 160m section of Dobb lane in front of the site could be widened to improve capacity and sight lines along this section. This leaves a length of approximately 235m from the North Eastern boundary of the site to the junction with Woodhead Road, which in some cases is narrow with parked cars on one side. On this basis, a housing allocation is not justified but there is a reasonable prospect that the site constraints can be overcome to deliver housing post-2031.</p>				
SL2188 – north-east of Laithe Avenue	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a</p>	No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.	<p>This site has been tested as a Local Plan option as it was Provisional Open Land in the UDP. There is a reasonable prospect that this site will be available beyond 2031.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is</p>	N/A

	reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available.		capable of coming forward for development post 2031	
<u>Hade Edge</u>	a) Is the site suitable for the proposed use? In the case of housing and mixed-use allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure? For mixed use sites - how was the mix/ proportion of uses determined?	c) Is the site available and deliverable in the timescales envisaged <sup>3</sup> ?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
H288a – land at Dunford Road (66 dwellings)	This site was assessed as suitable using the Local Plan site allocations methodology (BP23). The Local Plan clearly sets out the constraints including potential improvements to local highway links, provision of a pedestrian footway, surface water drainage, an odour source (farm to the south-east of the site), proximity to SPA/SAC/SSSI and the proximity to listed buildings. The required reports are also listed.  The constraints have been overcome	No constraints have been identified which would result in a reduced developable area. The indicative site capacity is therefore appropriate based on the approach set out in EX30.2.	This site is available as shown by the Call for Sites submission and approved planning application (Jones Homes Yorkshire).  This site is deliverable and is phased as delivering homes in 2018/19 which is realistic as the site now has full planning permission (2017/91623).	N/A

<sup>3</sup> For housing allocations - as set out in the Council's housing trajectory in the updated Housing Supply Topic Paper (December 2017) (EX30.2). For safeguarded land - at 2031 and beyond.



	<p>through the planning applications process as this site now has full planning permission (2017/91623).</p> <p>In accordance with the Habitats Regulation Assessment, a modification has been proposed to the H288a site box (SD4, AD-MM36).</p>			
SL2170a – Dunford Road	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case odour issues could be dealt with depending on future farming operations/changes. Formal pre-application advice has been sought by the landowner.</p>	<p>No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.</p>	<p>This site is available as shown by the Call for Sites submission and recent request for formal pre-application advice by the landowner.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031</p>	N/A
SL2170b – Dunford Road	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable</p>	<p>No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.</p>	<p>This site has been tested as a Local Plan option as it was Provisional Open Land in the UDP. There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for</p>	N/A

	and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case, there although there are no significant site constraints, there is no evidence at present regarding a willing landowner or planning activity.		development post 2031.	
<u>Scholes</u>	a) Is the site suitable for the proposed use? In the case of housing and mixed-use allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure? For mixed use sites - how was the mix/ proportion of uses determined?	c) Is the site available and deliverable in the timescales envisaged <sup>4</sup> ?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
H297 – land east of Ryecroft Lane (47 dwellings)	This site was assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The Plan provides clear guidance on the constraints including improvements to visibility splays, provision of a pedestrian footway and limited surface water drainage options. Such constraints have been overcome through the full planning permission (2017/91361) which provides a	There were no constraints identified which would result in a reduction to the developable area of this site. The capacity is justified as it has been applied to the developable area on the basis of the approach set out in EX30.2.	This site is available as shown by the planning permission (2017/91361, Miller Homes).  This site is deliverable and is phased to start in 2019/20 which was based on the fact that a planning application had been submitted on this site. As permission has now been granted and the development	N/A

<sup>4</sup> For housing allocations - as set out in the Council's housing trajectory in the updated Housing Supply Topic Paper (December 2017) (EX30.2). For safeguarded land - at 2031 and beyond.

	<p>footway across the site frontage, sufficient visibility splays and a soakaway zone for surface water. This site is under construction.</p> <p><b>Proposed modification:</b></p> <ul style="list-style-type: none"> <li>• <b>Add Transport Statement to reports required</b></li> </ul>		<p>has started it is likely that there will be some delivery on this site earlier than anticipated.</p>	
<p><b>H297 – land east of Rycroft Lane, Scholes</b>  <b>SL3359 – land to the east of Rycroft Lane, Scholes</b></p> <p>i) <u>Have options for the delivery of site SL3359 been explored, including the relocation of the children’s play area to facilitate access via site H297?</u></p> <p>Sites H297 and SL3359 are separated by a council-owned play area and relocation would be subject to the consideration of NPPF paragraph 74 and would also require evidence that there is permission from the landowner to use this access. The site promoter has not submitted a development option or evidence to show proposed access through the recreation area between H297 and SL3359. The recreation area is owned by Kirklees Council and no option has been put forward by the council to re-configure the play area in this location. In any case, the planning permission for H297 (2017/91361) does not provide road access to the recreation ground and is now under construction.</p>				
<p>H597 – land south of Sandy Gate (141 dwellings)</p>	<p>This site was assessed as suitable for housing using the Local Plan site allocations methodology (BP23). The Plan provides clear guidance on the constraints including a potential odour source near the site (farm) and listed buildings.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Assessment provided with a planning application will inform and direct the nature and scale of any mitigation</p>	<p>There were no constraints identified which would result in a reduction to the developable area of this site. The capacity is justified as it has been applied to the developable area on the basis of the approach set out in EX30.2.</p>	<p>This site is available as shown by the Call for Sites submission.</p> <p>The site is phased to deliver dwellings later in 2019/20 which is appropriate as the site is deliverable and available. The phasing is in accordance with the approach set out in EX30.2.</p>	<p>N/A</p>

	<p>measures required.</p> <p>A site specific Heritage Impact Assessment (LE76) has been produced for this site and is considered in the answer to question (i) below for H597.</p>			
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**H597 – land south of Sandy Gate, Scholes**

- i) Has the impact of the proposal on heritage assets been adequately assessed and addressed? What are the implications arising from the Heritage Impact Assessment (LE76)? Is the indicative site capacity deliverable?

A site specific Heritage Impact Assessment (LE76) identifies the boundary walls as being of considerable significance in addition to the view of the heritage asset when viewing the listed buildings from east to west along Sandy Gate. The northern part of the site is of moderate significance whereas the southern area is of slight significance. The walls could be retained as part of the development and the design of the site layout will be sensitive to the presence of listed buildings in the vicinity of the site, however as open spaces are included in development proposals this does not necessarily mean a reduction in the capacity of this site. In the context of this assessment the allocation therefore remains justified. As such Policy PLP35 is considered the appropriate mechanism to secure mitigation measures, with document LE76 a reference document which will be taken into account in determining a planning application on this site.

- ii) Has the effect of the proposal on the character and setting of the village been adequately assessed and addressed?

This site is within the non-green belt area of Scholes village and is currently safeguarded land (Provisional Open Land) in the Kirklees UDP. The site is visible from the surrounding roads of Sandy Gate, Ryecroft Lane, Scholes Moor Road and Paris Road but is not within an NPPF valued landscape. The proposed site has currently little or no vegetation other than semi-improved grassland pasture and it forms the entrance to the approach to Scholes Village from the south, setting the character for the village from this direction. Careful mitigation will help maintain the village character and reduce the visual impact of this development.

The proposal would be subject to policies in the Local Plan Design Policy (PLP24) that seeks to ensure that the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape and the Landscape Policy (PLP32) which states proposals should be designed to take into account and seek to enhance the landscape character of the area, giving particular consideration to the setting of settlements; woodlands, trees and field boundaries.

Whilst a housing estate is not part of the rural character there are other large estates present in Scholes and the proposed housing allocation

is not out of character for this setting. Potential mitigation includes retaining the boundary treatment of dry stone walls, careful positioning of public open spaces and appropriate native tree planting. Incorporating more traditional housing styles and use of traditional material types along the outer edges of the scheme will need to be considered and the whole scheme carefully designed in accordance with PLP24 to mitigate landscape impacts.

<p>SL3359 – land to the east of Ryecroft Lane</p>	<p>This site was assessed using the Local Plan site allocations methodology (BP23) which determined that the site should be safeguarded land.</p> <p>There is insufficient evidence to demonstrate this site is deliverable and/or developable during the Local Plan period, however there is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available.</p>	<p>No site capacity has been assigned to safeguarded land options in the Local Plan as this would be determined through a review of the Local Plan.</p>	<p>This site is available as shown by the Call for Sites submission.</p> <p>There is a reasonable prospect that site specific constraints can be overcome and the site is capable of coming forward for development post 2031. In this case third party land would need to be acquired which is not currently available.</p>	<p>N/A</p>
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<u>Hepworth</u>	a) Is the site suitable for the proposed use? In the case of housing and mixed-use allocations, does the Plan provide clear guidance on requirements and constraints, and seek appropriate mitigation measures?	b) Is the indicative site capacity appropriate, taking account of constraints and the provision of necessary infrastructure? For mixed use sites - how was the mix/ proportion of uses determined?	c) Is the site available and deliverable in the timescales envisaged <sup>5</sup> ?	d) For sites currently in the Green Belt - what effect would the proposed boundary change and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt?
MX1912a – Dobroyd Mills, Hepworth Road (60 dwellings and 944 m2 employment) (Green Belt release)	<p>This site was assessed as suitable as a mixed use site using the Local Plan site allocations methodology (BP23).</p> <p>The Plan provides clear guidance on the constraints including highways concerns with intensification of HGV access, presence of flood zone 3 and priority habitat (both removed from the developable area), potential noise source, potential contamination, proximity to listed buildings and a public right of way (can be accommodated in the development).</p> <p>The reports required are listed and there is a reasonable prospect that the site constraints will be overcome to allow housing and employment provision on this site.</p>	<p>The developable area has been reduced to take account of high flood risk areas and priority habitat areas. The resultant housing capacity is appropriate in accordance with the site allocations methodology and approach set out in EX30.2.</p> <p>The approach to the mix of housing and employment uses is set out in the Local Plan methodology statement (paragraph 4.26, BP23) and has generally been assigned on a 50/50 basis. In this case the</p>	<p>This site is available as shown by the Call for Sites submission and the planning application for this site (2017/90620).</p> <p>The site has been phased to deliver homes from 2020/21 but in the context of the current planning application there may be earlier delivery than expected.</p>	<p>This is a brownfield site in the green belt. The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.</p> <p>Exceptional circumstances exist to amend the green belt boundary as this site is required to meet the objectively assessed need for both housing and employment land in the district. After due consideration of all relevant non- green belt alternatives, the need to promote sustainable development patterns,</p>

<sup>5</sup> For housing allocations - as set out in the Council's housing trajectory in the updated Housing Supply Topic Paper (December 2017) (EX30.2). For safeguarded land – at 2031 and beyond.

	<p>The site has been assessed in the Kirklees Employment Market Strength Assessment (LE11) which concluded it may be attractive to the market. The mixed use proposal is not likely to lead to the intensification of already established employment use and would not therefore increase HGV movements upon the surrounding highway network.</p> <p>High level site access and local highway constraints have been considered within the context of the site capacity. The Transport Statement provided with a planning application will inform and direct the nature and scale of any mitigation measures required.</p> <p>A mixed use planning application is currently being considered (2017/90620) and heritage issues have been resolved through that application.</p>	<p>mix has been influenced by the planning application. The council's response to Matter 26 (m) clarifies how the mix of employment within that part of the site has been determined.</p>		<p>the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating development on the site outweigh any adverse effects on the green belt.</p>
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**MX1912a – Dobroyd Mills, Hepworth Road, Hepworth**

i) What key buildings/features are to be retained on the site?

There are no listed buildings on this site and the site is not within a conservation area. The site allocations box does not specify the retention of the existing buildings on this site as this would be unduly restrictive. This would allow the complete re-development of this site for housing but also the conversion of the mill to residential (which could increase the site capacity) in addition to some new build housing. Any development on the site would have to have regard to Local Plan policies PLP7 in relation to making efficient use of previously developed land in sustainable locations and PLP24 (re-use and adaptation of existing buildings) and PLP35 (Historic Environment).

**Matter 44: Impact of the allocation on the Green Belt and the purposes of including land within it**

**Holme Valley South**

**Green Belt Review tests 2 and 3**

The edge reference and value reflects the Green Belt Review outcomes (SD19 and SD20)

Tests 2a to 2c are site specific assessments of the degree to which land performs a green belt role and function following the methodology for those tests set out in the Green Belt Review (SD19)

Test 2d defaults to 'green - no impact' in all cases. This follows Stage 1 hearing discussions and is set out in the Council's note; Green Belt Review (SD19) Test 2d Reassessment (ID17). Struck-through text removes reference to the setting of historic assets.

Test 3: One of the purposes of including land in the green belt is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (Green Belt Review page 17). By constraining the potential for the expansion of built-up areas the green belt will direct development pressure towards opportunities to recycle land within urban areas and thereby achieve urban regeneration. The green belt is considered to support this green belt purpose equally throughout Kirklees. Test 3 is not included within the Green Belt Review matrix (Green Belt Review Appendix 1) and the Test 3 column is therefore neutral.

**Site Allocation Methodology**

Site specific assessment of the ability of the site to present a strong new green belt boundary and its relationship to the existing settlement form, following the assessment methodology set out in BP23 Local Plan Methodology Statement Part 2

		Green Belt Review					Site allocation methodology		
Option	Edge ref and value	Test 2				Test 3	Suitability of potential boundary	Relationship to settlement	Assessment set out in BP29.1
		2a: merger	2b: sprawl	2c: encroachment	2d: historic towns	urban regeneration			
H727a Miry Lane Thongs-bridge	HF27_B	No impact	Well contained	Minor visual link to wider landscape	No impact		Good	Settlement extension	The majority of this option lies within the settlement, but its western extent projects into the green belt between the settlement and the adjacent cricket ground. As it is largely contained by urban land uses its development would have only a limited impact on openness. The existing green belt boundary in this location is poorly defined on the ground and this option would present the opportunity to create a more defensible boundary.
H2585 Water Street Hinchliffe Mill	HF11_B	No impact	Marginal	Marginal	No impact		Good	Settlement extension - on existing developed footprint	This option extends marginally into the green belt over the area occupied by a former industrial building, now demolished. The area is hardstanding, forms part of a site with permission for redevelopment and is physically separated from the open agricultural land to the south west by a steep change in levels, the site being lower than the surrounding land. Removing this small area of green belt would have minimal impact on openness and would allow a long term boundary to be maintained once the redevelopment scheme is implemented.
MX1912a Dobroyd Mills Hepworth	HP1_B	Restricted gap to Jackson Bridge	Well contained	Not countryside	No impact		Good	Settlement extension - on existing developed site	That part of this option that is in the green belt consists of Dobroyd Mills, which is a substantial mill building and is therefore brownfield. Current national planning guidance states that redevelopment of brownfield land may not be inappropriate in the green belt and the extent, scale and massing of the mill buildings means that the mill site could be redeveloped under the terms of current policy without undermining the role and function of the green belt. One of the purposes of the green belt is to prevent the merger of settlements and the green belt in this location prevents the intensification of urban land uses between Hepworth and Jackson Bridge, which is overwashed. The mill site includes substantial built form on the road frontage so redevelopment could have no greater effect on the urban appearance of this stretch of road frontage than already exists. Immediately north of the mill site Dean Dike and its treed valley meets the road and this maintains a narrow degree of undeveloped separation between the mill site and the 'centre' of Jackson Bridge, which would be of critical importance if the mill site were to be removed from the green belt. The undeveloped stretch of frontage to the west of Hepworth Road, which is heavily treed and contains a stretch of Rakes Dike, would also be of critical importance to the preservation of any appearance of separation between Hepworth and Jackson Bridge.