

## **Hearing Statement – Barratt Homes**

### **Matter 8 – Approach to site allocations and Green Belt release**

***Issue – Is the Plan’s approach to identifying site allocations (housing, employment and mixed use), safeguarded land and Green Belt releases soundly based and in line with national policy?***

#### **INTRODUCTION**

- 1.1 We write on behalf of our client Barratt Homes to provide their hearing statement to Matter 8 of the Kirklees Local Plan Examination in Public. The comments made in this statement should be considered alongside Barratt Home’s representations to the Publication Draft Kirklees Local Plan (PDLP) dated November 2016.

#### **Hearing Statement Summary**

Barratt Homes want a sound Local Plan to be in place. They believe that this is paramount in achieving the Borough’s housing and economic objectives. Particularly given that Kirklees Council is a Green Belt authority. Importantly, Barratt Homes believe that a sound Local Plan can be achieved through the modifications process.

The Local Plan provides the platform in which the quantitative and qualitative housing needs of the District can be met over the plan period. Whilst Barratt Homes support large elements of the Local Plan, they believe that additional housing sites need to be released from the Green Belt for development to ensure the delivery of the District’s Objectively Assessed Housing Needs for a 15-year period post the adoption of the Local Plan.

Barratt Homes believe that the Council’s approach to identifying site allocations and green belt release is soundly based in respect of the majority of the proposed housing allocations. There is, however, one anomaly and this is the Council’s failure to release Barratt Home’s land interest at Soothill Lane, Batley (Ref. H586).

Barratt Homes are keen to ensure that a sound Local Plan is delivered and consequently request that the modifications suggested in this statement are considered as Main Modifications to be consulted on prior to the adoption of the Local Plan.

#### **LAND AT SOOTHILL LANE, BATLEY – SUPPORT FOR SITE REFERENCE H586**

- 2.1 Barratt Homes **object** to the site being rejected as a potential housing option within the Kirklees Local Plan. It is our understanding that the Council’s principle point of concern associated with the site’s development are in relation to the impact on the Green Belt. Accordingly, Barratt Homes previously provided evidence to overcome this concern by letter dated 16<sup>th</sup> December 2016.
- 2.2 The previously submitted representations and its enclosures can of course be provided on request. Barratt Homes’ response to Matter 4 deals directly with the point raised above in respect of the site being needed to contribute to our evidenced shortfall in housing sites needed to meet the District’s Objectively Assessed Housing Needs.
- 2.3 This statement focuses on matters associated with the site’s release from the Green Belt. With regards to the Inspectors specific questions, this hearing statement responds to Question A; Question D(i); Question D(iv); and Question D(vii).

2.4 A Landscape and Green Belt Review has been carried out by Golby & Luck Landscape Architects to evaluate the Soothill Lane, Batley site in landscape and visual terms. The document subsequently considers the site's contribution to the surrounding Green Belt and identifies any likely constraints and opportunities relevant to an emerging development strategy. The report seeks to identify an appropriate landscape framework for development within the site, informed through the consideration of relevant landscape and Green Belt issues.

2.5 With regards to the site's current location within the Kirklees Green Belt, the document provides an assessment of the site against the five Green Belt purposes identified in Paragraph 80 of the National Planning Policy Framework. The conclusions of this assessment are identified below.

- ***The development of the site would not result in unrestricted urban sprawl: -***

The site has well-defined, robust and enduring boundaries. The parcel of the site located to the south of Soothill Lane is bound to the north and east by highway boundaries with associated linear development. To the west this parcel is bound by a combination of settlement, landform, and an allocated housing site. To the south the boundary of this parcel is bound by Grange Road, beyond which are areas of pasture and settlement.

The parcel of the site located to the north of Soothill Lane is bound to the north and east by significant areas of woodland. To the south this parcel is bound by highways with associated development, and to the west it is bound by existing settlement areas. There is a short section at the north-west boundary of this parcel that is defined by a remnant field boundary hedgerow and fence line with open countryside beyond. However, this boundary is made somewhat distinct from the wider landscape through the changing landform.

Whilst the site comprises open land, its boundaries are clearly well-defined robust and enduring, and if developed can contain development within a framework of settlement, vegetation cover and landform.

- ***The development of the site would not result in the merging of adjacent settlements: -***

The setting of the Soothill ridge extends between West Ardsley and the north-east fringe of Batley. The ridge comprises a more complex network of highways, development, landholdings and landform with a fragmented and compartmentalised character, contrasting with the open landscape of the east of the A653 Leeds Road. Development extends along the A653 Leeds Road between Chidswell and the Soothill Lane junction. Likewise, Soothill Lane has in part a developed character with an existing perception of settlement extending into the countryside. This in turn creates a settled appearance to the landscape associated with the boundaries of the site that separate it from the wider Green Belt to the north, and West Ardsley beyond.

Strictly in plan form the development of the site would appear to result in the creation of a pinch-point between Batley and West Ardsley. However, for the reasons set out above the perception of this pinch-point already exists, particularly when traveling along the highways between these settlements where the experience of traveling between built up areas is already compromised.

The Development of the site would result in the loss of land between settlements but would not result in their coalescence. More importantly the development of the site is not likely to erode the separate character and identity of these settlements any more than the existing built-development experienced when travelling between them.

- ***The site does not assist in safeguarding the countryside from encroachment: -***

The purpose of the Green Belt review is to assist in the identification of a strategic development allocation to meet the development needs of the Local Authority. There is an assumption that whilst some of these needs may be met on land within the urban area there will be a requirement for large allocations within the countryside, most of which is designated as Green Belt. Therefore, there is an inevitability that these allocations will result in an encroachment into the countryside (as the allocation on neighbouring land to the site did as part of the former UDP). It is important that any such allocation is concentrated on land with the least environmental value, and land making a limited contribution to the setting of the Green Belt.

The previously submitted Landscape Assessment and Green Belt review establishes that the site is: -

- Not covered by any statutory or non-statutory designation (beyond the Green Belt) that would prohibit its development for residential development;
- Considered to be of more limited landscape quality and value when compared to the wider countryside;
- Does not contain important or notable features sensitive to change, and does not form part of a green corridor containing long distance trials of District value (for example the Leeds Country Way and Kirklees Way);
- Part of a compartmentalised and fragmented landscape that creates a contained setting separate to the more open landscapes to the south-east and north-west; and
- Defined by robust and defensible boundaries limiting encroachment beyond the site into the wider countryside.

Therefore, the location of the site in combination with the value and disposition of its associated features provides a robust framework to harness development and restrict any encroachment into the surrounding countryside.

- ***The proposed development of the site will have no detrimental effect on the setting and special character of historic features: -***

The site does not form a part of or adjoin any part of the historic settlement or landscape as identified through designation (such as Conservation Area or Historic Park and Garden). The site does not contain any Listed Buildings. At the southern boundary of the site the toll gates at Grange Road are a Grade II Listed structure. The gates form part of the highway infrastructure associated with the lane bound by residential development to the north, limiting any contribution that the site makes to the setting of this asset.

To the north the site is bound by modern development associated with Soothill Lane. Soothill Manor is not a recognised heritage asset and is set within heavily treed ground that limit any relationship between the property and surrounding landscape. To the south St Pauls Church affords a prominent ridgeline location above the rolling pasture fields that fall away from the Hanging Heaton ridge into the local valley setting. The church is a Grade II Listed Buildings and therefore not a heritage asset of the highest significance (NPPF para 132) but it makes an undeniable contribution to the setting of the ridgeline to the south of the site that includes views towards it from the local network of public rights of way.

Whilst most of the site is unconstrained by heritage assets (both designated and undesignated) it is important that any development framework considers the setting of St Pauls Church and views towards this asset.

- ***To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: -***

The site is not derelict or other urban land. The site comprises countryside set within a strong framework of built-form, vegetation cover, and landform providing a contained setting. However, it is unlikely that the development needs of the Local Authority will be met through the allocation of derelict or other urban land. This was not the case for the former UDP that allocated large areas of countryside to meet the needs of residential and employment growth. There is no reason to believe that this will have changed and it is therefore important to identify new allocations on land with limited landscape value that make a restricted contribution to the setting of the Green Belt.

- 2.6 The loss of the site from Green Belt would therefore not cause overall harm to the purposes of the Green Belt. The site is part of a compartmentalised and fragmented landscape that creates a contained setting separate to the more open landscapes to the south-east and north-west and is defined by robust and defensible boundaries limiting encroachment beyond the site into the wider countryside. Whilst the site comprises open land, its boundaries are clearly well-defined robust and enduring, and if developed can contain development within a framework of settlement, vegetation cover and landform.
- 2.7 This landscape review element of the previously submitted assessment also identified that the site is not subject to any major landscape constraints that would prohibit its development. Local constraints have been identified that can be used to inform the identification of an appropriate landscape framework to harness development. These constraints have been identified alongside opportunities for landscape creation/enhancement strategies set out in the landscape framework plan enclosed within the assessment.
- 2.8 The landscape constraints can be summarised as: -
- The existing public access routes associated with the site;
  - The overhead powerlines crossing the northern half of the site;
  - The sloping landform associated with the southern half of the site, and associated views towards the valley setting of St Pauls Church;
  - The valley setting of pastoral fields with more traditional built-form (that includes Grange Farm) creating an open landscape setting rising towards St Pauls Church on the opposing ridgeline;
  - The treed and wooded appearance of the higher land associated with Soothill Manor that is visible from the wider landscape setting to the east beyond the A653 Leeds Road;
  - The lower lying pastoral farmland with more intricate network of native boundary hedgerows at the north-east corner of the parcel of the site located to the south of Soothill Lane; and
  - The exposed setting of the north-west boundary of the parcel of the site located to the north of Soothill Lane at Soothill Wood that is viewed from the wider setting of the Howley Beck valley to the north-west.
- 2.9 These constraints have been used to inform the identification of an appropriate landscape framework to the site that has the potential to successfully harness development within it, and secure many landscape enhancements. The landscape framework comprises: -
1. The existing framework of built-form, woodland, and landform afforded by the site. The built-form extends to the south and west of the site in the form of the urban fringes of Batley. To the east a continuous line of residential development extends alongside the A653 Leeds Road. To the north built-form is concentrated at the junction with the Leeds Road and Soothill Lane, and at Manor Farm Drive and Solway Road. The site also affords a structured network of woodland cover at its northern boundaries providing further

containment/separation with the landscape to the north. In terms of landform the ridgelines to the north-west of the site compartmentalises the landscape creating further separation. In addition, the relatively flat nature of the main body of site in combination with the built-form running alongside the A653 Leeds Road further limits any immediate relationship with the more open land to the east. These elements combine to create strong, well-defined and enduring boundaries for development within the site.

2. The site adjoins areas of modern housing development, and is in part contained by linear forms of built-development. This will be further reinforced through the final delivery of the allocated housing development at the western boundary of the site further reinforcing the relationship between the site and settlement;
  3. St Pauls Church affords a prominent ridgeline location to the south of the site that is viewed from the southern edges of the site within the context of the rising pastoral land that defined the valley setting. This relatively small area of farmland is valuable to the setting of the church, defined by small fields and a structured network of native boundary hedgerows and tree cover. The traditional stone buildings such as Grange Farm also assist in extending the historic setting of the church and associated landscape into the southern fringes of the site. These pastures and views towards the church should be retained as part of any emerging development framework and linked with the creation of a wider green infrastructure network;
  4. The public rights of way crossing the site are clearly an important resource that should be retained and enhanced. Footpath BAT/45 crossing north/south through the site has the potential to become a primary green corridor linking the valley setting to the south of the site with Soothill Hill and associated areas publically accessible woodland. Likewise, the public footpath BAT/43 and Sykes Lane should be retained as secondary green corridors linking the settlement with the wider countryside to the east of the A653 Leeds Road;
  5. Potential exists to extend the woodland cover at the northern fringes of the site creating three new woodland features that: -
    - a. Reinforce the wooded appearance of the elevated land associated with Soothill Manor, and subsequently restricting development from the higher landform that may become visible from the east;
    - b. Extend the wooded setting of Soothill Wood and create an enhanced landscape presence at this main junction along the A653 Leeds Road; and
    - c. Extend Soothill Wood along the ridgeline at the northern boundary of the site to contain development in views from the north-west.
  6. Protect the more structured network of hedgerow cover associated with the lower lying pastoral land at the north-east corner of the parcel of the site located to the south of Soothill Lane. This may be achieved in combination with the creation of new wetland areas forming part of a sustainable drainage system, and new areas of woodland cover; and
  7. Create new areas of green space within the site that will make a valuable contribution to the setting of the site and overall morphology of the extended settlement. New green spaces should be strategically located and where possible combined with leisure, recreation, ecological and drainage enhancements to create multifunctional landscapes.
- 2.10 The identified landscape framework was fundamental in guiding the masterplan options for the site and the formulation of the amended development proposals. Through utilising the conclusions of the Landscape & Green Belt Assessment, Barratt Homes have sought to formulate a development which can enhance the eastern area of Batley through a sensitive extension to the existing urban area, whilst importantly enhancing identified areas of landscape

and habitat value in perpetuity to provide long term permanence to the Green Belt boundary in this location of the District.

- 2.11 We request that the Inspectors review the submitted Landscape & Green Belt Assessment to fully consider the conclusions raised. The proposed masterplan for the development is enclosed for ease of reference.
- 2.12 The proposed development of the Soothill Lane, Batley site can enhance the eastern area of Batley through a sensitive extension to the existing urban area, whilst importantly enhancing identified areas of landscape and habitat value in perpetuity to provide long term permanence to the Green Belt boundary in this location of the District.
- 2.13 We believe that the proposed number of homes to be delivered at this site are required to meet both the Sub Area's and District's housing needs. The development also provides the opportunity to facilitate the delivery of a significant number of environmental benefits.
- 2.14 No other site presently allocated within the Batley area can deliver a comprehensive landscape led development of market and affordable housing within the first 5 years of the plan, alongside the proposed substantial level of community and green infrastructure.

#### **RESPONSE TO QUESTION A**

- 3.1 We do not believe that the Council has undertaken a robust and comprehensive assessment of development capacity within existing urban areas and other areas outside the current Green Belt. As identified in our response to Matter 4, we believe there are deliverability concerns associated with a number of the proposed housing allocations which are not currently located in the Green Belt. Accordingly, further land will need to be released from the Green Belt to meet the District's Objectively Assessed Housing Needs.

#### **RESPONSE TO QUESTION D(I)**

- 4.1 The Council's assessment of Green Belt edge sites has not been robust or justified in respect of Barratt Homes' Soothill Lane, Batley site. Unequivocal evidence has been presented by Barratt Homes to justify the release of the Soothill Lane, Batley site from the Green Belt for residential development. The site does not fulfil Green Belt purposes and through utilising the conclusions of the Landscape & Green Belt Assessment, Barratt Homes have sought to formulate a development which can enhance the eastern area of Batley through a sensitive extension to the existing urban area, whilst importantly enhancing identified areas of landscape and habitat value in perpetuity to provide long term permanence to the Green Belt boundary in this location of the District.

#### **RESPONSE TO QUESTION D(IV)**

- 5.1 Barratt Homes do not believe that sufficient weight has been attributed to the proposed site-specific solution that Barratt Homes are seeking to deliver at the Soothill Lane, Batley site. In their original submissions to the Council, Barratt Homes were promoting the comprehensive development of the whole of the Site Ref.586. However, following the undertaking of detailed ecology, landscape and Green Belt assessment work they have amended the proposals to deliver a landscape led development which seeks to preserve and enhance the green framework of the site and its surroundings. The development proposals now seek to deliver an

exemplary development of up to 500 new homes and substantial areas of recreation, habitat and amenity areas.

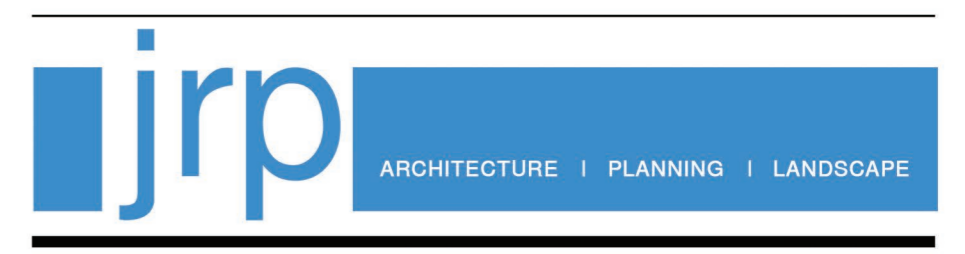
#### RESPONSE TO QUESTION D(VII)

- 6.1 In respect of the Soothill, Batley site, the Council have not fully considered the sustainable development requirements of the NPPF or the document's housing deliverability criteria. Barratt Homes' previously submitted representations providing evidence of the site is sustainably located and is deliverable in respect of suitability, availability and achievability.
- 6.2 The site can also be categorised as an urban extension site that "infills" two areas of existing residential areas. The built-form extends to the south and west of the site in the form of the urban fringes of Batley. To the east a continuous line of residential development extends alongside the A653 Leeds Road. To the north built-form is concentrated at the junction with the Leeds Road and Soothill Lane, and at Manor Farm Drive and Solway Road. The site also affords a structured network of woodland cover at its northern boundaries providing further containment/separation with the landscape to the north. In terms of landform the ridgelines to the north-west of the site compartmentalises the landscape creating further separation. In addition, the relatively flat nature of the main body of site in combination with the built-form running alongside the A653 Leeds Road further limits any immediate relationship with the more open land to the east. These elements combine to create strong, well-defined and enduring boundaries for development within the site.
- 6.3 The site also adjoins areas of modern housing development, and is in part contained by linear forms of built-development. This will be further reinforced through the final delivery of the allocated housing development at the western boundary of the site further reinforcing the relationship between the site and settlement.
- 6.4 The site's location and surrounding built form render it an obvious site for future residential development. Especially when considering the environmental enhancements that Barratt Homes' proposed masterplan for the site can deliver.
- 6.5 Within our previously submitted representations we provided evidence to demonstrate that our client's Soothill Lane, Batley site represents a sustainable and deliverable residential development site, which could deliver new homes within the first 5-year period of the Local Plan.
- 6.6 The site is located within a sustainable location and is well located in terms of accessing jobs, shops and services via non-car modes of transport. The site is located to the east of the town of Batley, within the Batley & Spen Sub-Area where a significant level of new housing allocations are due to be located, commensurate with the number of settlements located within the Sub-Area; the number of services and facilities available within the Sub-Area's settlements; the area's location in respect of the strategic transport network; and its overall capacity for sustainable growth.
- 6.7 The Soothill Lane, Batley site is situated in a **suitable** and highly sustainable location in respect of existing settlement form and there are no technical or environmental (built and natural) constraints that would preclude the development of the site. The site is **available** now as it is under the control of a national house builder who is actively seeking to secure planning permission for the residential development of the site. The site can also be considered **achievable** as our clients can deliver new homes on the site within the next 5 years.



**Quantum and Types of Development**

-  Open Space (35.75 Ha / 88.34 acres)
-  Allotments (1.97 Ha / 4.87 acres)
-  Play Space
-  Public Footpaths
-  SUD's
-  Residential Parcels (500 homes)
-  Woodland / Planting (6.88 Ha / 17.00 acres)



CLIENT: BARRATT LEEDS	DRAWING NUMBER: 12 4579 SK105
PROJECT: SOOTHILL	SCALE @ A1: 1:2500
DRAWING: ILLUSTRATIVE MASTERPLAN	DRAWN: LB/SD
	DATE: 01.16
	CHECKED: VS
	DATE: 01.16



**12 4579 SK105 / ILLUSTRATIVE MASTERPLAN**

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