



REPRESENTATIONS

DRAFT KIRKLEES LOCAL PLAN - STRATEGY AND
POLICIES NOVEMBER 2015 REPRESENTATIONS
SUBMITTED ON BEHALF OF STRATA HOMES
YORKSHIRE

Proposal: Representations
Client: Strata Homes Yorkshire
Document ref: HG2435
Date: 1 February 2016

Signet Planning: Rowe House
10 East Parade
Harrogate
HG1 5LT
t: 01423 857510
e: info@signetplanning.com



Copyright: The contents of this document must not be copied or reproduced in whole or in part without the written consent of Signet Planning

CONTENTS

SECTION 1:	INTRODUCTION	1
SECTION 2:	SUITABILITY AND DELIVERABILITY OF THE ROBERTTOWN SITE (SHLAA REF 813)/LOCAL PLAN REF H442	3
SECTION 3:	ASSESSMENT OF ROBERTTOWN SITE (REF NO. H442 AGAINST LOCAL PLAN EVIDENCE BASE WORK	14
SECTION 4:	COMPARITIVE ASSESSMENT OF ALTERNATIVE HOUSING SITES	22
SECTION 5:	ASSESSMENT OF HOUSING NEED	25
SECTION 6:	SUPPLY SOURCE ASSESSMENT	34
SECTION 7:	HOUSING DISTRIBUTION	39
SECTION 8:	REPRESENTATIONS TO OTHER RELEVANT POLICIES	42
SECTION 9:	CONCLUSIONS	46

APPENDICES

Appendix 1	Drawing No. Rev 1 – Location of Comparison Site Assessment
	Table 1: Signet Review of LUC Sustainability Appraisal
	Table 2: Kirklees SHLAA Site Assessment
	Table 3: Summary Comparison

Note: These representations should be read in conjunction with the report entitled Green Belt Analysis prepared by Smeeden Foreman dated January 2016.

SECTION 1: INTRODUCTION

- 1.1 Signet Planning is appointed by Strata Homes Yorkshire to submit representations to the draft Kirklees Local Plan – Strategy and Policies (November 2015) together with the related evidence base documents.
- 1.2 Strata Homes have a landholding interest in Kirklees which has been actively promoted on an upfront basis as part of the Local Plan process. It features as site Reference 812 – Land to the south of Richmond Park Avenue, Roberttown in the SHLAA 2015 Assessment and Ref No. H442 in the Local Plan evidence base. For the purposes of our representations the site is known as the ‘Roberttown Site’.
- 1.3 These representations focus on the failure of Kirklees MBC to allocate this specific site for housing purposes within the draft Local Plan.
- 1.4 Section 2 of this report will initially outline the detailed technical and environmental evidence base that Strata Homes and their consultancy team has already undertaken to demonstrate that the site is available, suitable and deliverable to support the future housing growth of the district. Our Development Framework Report promoting the site was formally submitted to the Local Authority in October 2014 and this report demonstrates that the level of justification goes well beyond that which is typically requested at this stage in the process. It clearly emphasises the commitment of Strata Homes to fully embrace the Local Plan process of evaluating the housing proposal and the Development Framework Report should be given substantial weight in the decision making process.
- 1.5 Section 3 of this report looks specifically at the Council’s assessment of the Roberttown site and we provide our views and responses to demonstrate the differences and disagreements with the Council’s approach. At Section 4 we go on to undertake a comparative assessment of other similar alternative housing sites within the local area of our site. We have specifically reviewed both the suitability and deliverability of proposed sites that are shown to be released from Green Belt and therefore feature as allocations within the draft Local Plan. It also reviews other rejected Green Belt sites that are being promoted for housing purposes to demonstrate that in terms of both harm to the purposes of the Green Belt and achieving key sustainability objectives our site is one of the best to deliver the housing growth objectives identified in the Local Plan.

- 1.6 As part of our case, Strata Homes have also commissioned Smeeden Foreman to prepare a Green Belt Analysis to examine in more detail the Council's methodology for reviewing Green Belt and providing further assessment of our site and other potential sites to determine whether they should be considered for release from Green Belt. This report is provided as a separate standalone document but should be read in conjunction with these representations.
- 1.7 Section 5 specifically assesses the objectively assessed housing need to demonstrate that the requirement should be re-evaluated based on our interpretation of the housing projection rates and the modelling work undertaken by Edge Analytics.
- 1.8 Section 6 examines the Council's assumptions regarding the housing land supply particularly the estimates relating to the delivery of existing commitments, projected future windfall allowances and achieving the housing trajectory rates through the lifetime of the Plan Period.
- 1.9 Section 7 examines the distribution of growth and settlement hierarchy to seek to demonstrate that the Roberttown site is in the location that is well served by existing services and facilities and sits well within the existing settlement hierarchy.
- 1.10 Section 8 specifically addresses other strategy and development policies that are relevant to developing housing on the Roberttown site that have not already been addressed in the above sections.
- 1.11 Paragraph 182 of the Framework outlines criteria which an independent Inspector will use to assess the soundness of the Local Plan. In summary, the key tests for soundness are that the Local Plan should be:
- Positively prepared;
 - Justified;
 - Effective, and
 - Consistent with National Policy.
- 1.12 There are key areas of the Local Plan which we consider do not meet the above tests of soundness and these will be addressed in the following sections of this report.

SECTION 2: SUITABILITY AND DELIVERABILITY OF THE ROBERTTOWN SITE (SHLAA REF 813)/LOCAL PLAN REF H442

2.1 The Framework encourages front loading of the planning system and Paragraph 158 of the Framework acknowledges that policies and proposals should be based on adequate, up to date and relevant evidence. As a responsible housebuilder, Strata Homes retained a consultancy team to provide sufficient evidence at this stage in the process to demonstrate the Roberttown site is both suitable and deliverable. These technical disciplines include the following:

- Flood Risk and Drainage Assessment;
- Landscape and Visual Assessment;
- Ecological Appraisal;
- Transport/Feasibility Study;
- Urban Design and Masterplanning.

2.2 The environmental and technical work has informed the understanding of the site constraints, the opportunities and the potential mitigation measures required as well as the effect on development capacity. Whilst there have been specific technical reports prepared for the above key disciplines, an overarching document entitled 'Development Framework Report' was prepared and formally submitted to the Council in October 2014. These details still remain valid and the level of technical work has demonstrated there are no fundamental issues to prevent the development coming forward and the constraints identified can be mitigated. The urban design and masterplanning work has spatially tested the evidence to demonstrate that a certain scale of development is sustainable, suitable and deliverable.

2.3 The preparation of the supporting technical evidence has been guided by addressing the following key issues:

- Identification of clear objectives intended to be achieved for the development;
- Identification of key planning and technical constraints including those that are fixed and those that need to be overcome through mitigation;

- Identification of the overall scale and quantum of land uses across the site;
- The identification of infrastructure needs to ensure that the development is viable, attractive and sustainable;
- The identification of an implementation route map identified next stages and any potential refinements beyond demonstrating that there are no 'showstoppers'.

Local Facilities

- 2.4 The site is well related to existing services and facilities. In terms of provision of education facilities, there is a nursery immediately to the north of the site and three primary schools within 15 minutes' walk of the site. There is also a secondary school (Spenn Valley High School and Sports College) located within five minutes' walk of the site on Roberttown Lane.
- 2.5 In terms of access to healthcare facilities, there are several medical practices situated just over 15 minutes' walk. The site also benefits from good local shops along Roberttown Lane within a 15 minute walk west of the site.

Connectivity

- 2.6 The site is well served by a range of bus services operating on roads adjoining the site with regular connections to larger towns and cities including Leeds, Bradford and Huddersfield.
- 2.7 Dewsbury, Ravensthorpe and Mirfield Railway Stations are all situated approximately 3-3.5 miles from the site which are within a reasonable catchment area for cyclists. As referred to above, within the catchment area of 2km there are many local facilities including convenience stores, pubs, restaurants, schools and recreation facilities. It is therefore considered that the site is situated in a very sustainable location well related and accessible to a wide range of services and facilities.

Baseline Technical Assessment Work

Ecological Assessment

- 2.8 An extended Phase 1 Habitat Survey has revealed that other than protecting a number of mature trees on site which had the potential to house bat roost and any development work should be conducted outside of the bird nesting season, there were considered no habitats within the site or adjacent to it considered suitable to

support protected species. The site comprised predominantly of improved grassland, tall ruderal, dense and scattered scrub and hedgerows all of which are not considered to be of significant ecological importance. A clear recommendation of the ecological mitigation was to seek to enhance local biodiversity through incorporating native planting and wildlife grassland to enhance foraging and nesting birds which can be achieved as part of the development.

Landscape and Visual Assessment

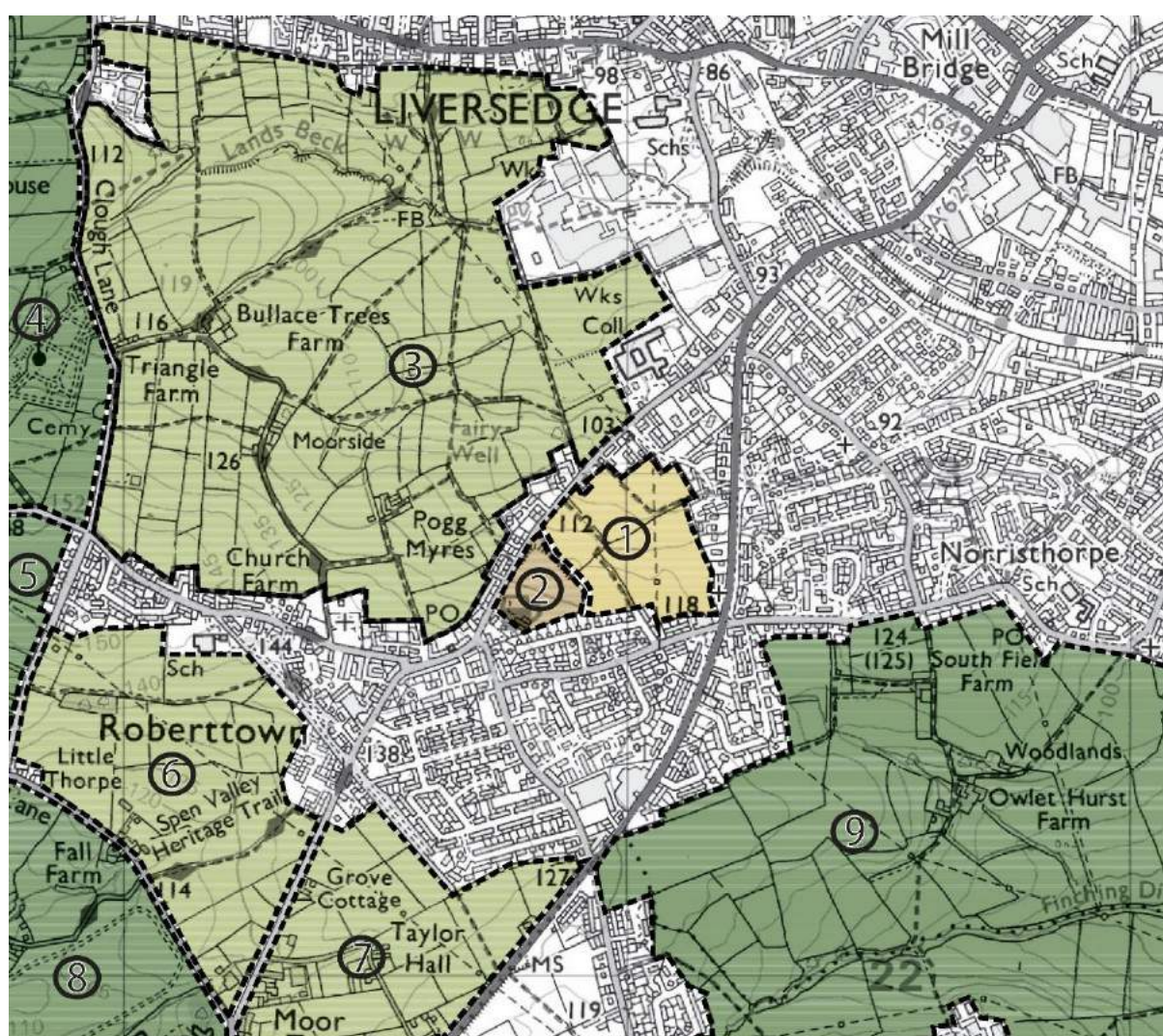
2.9 Landscape Consultants Smeeden Foreman concluded in their Landscape and Visual Impact Assessment dated October 2014 (Rev A) that the landscape character is identified within the Urban Fringe Character Area which is considered to be of medium sensitivity because although it is a green area, it is within an urban setting surrounded by housing and a secondary road.

2.10 In terms of visual amenity, our landscape assessment identifies 13 viewpoint locations. Five viewpoints were deemed to have a 'neutral' impact. Five other views were considered to have a 'minor adverse' overall impact with two viewpoints having a 'moderate adverse' impact. Only one of the views was considered to have a 'major adverse' overall impact. These more sensitive receptors are in close proximity to the site due to the amount of enclosure and build structures around the site. From the east, south and west, the site is screened by a continuous ribbon of high density housing. To the north of the site there are open views towards the site location. However, the view in this location is partially obscured by a band of mature vegetation along Roberttown Lane. The distant viewpoints from the north are such that any proposed housing scheme on the site of a reasonable scale would remain in context with the surrounding landscape features and fit into the existing land form. A zoomed in photograph below of Viewpoint 10 from the LVIA illustrates this point.



Green Belt Assessment

2.11 An analysis of the viewpoint locations in the LVIA reveals that the essential characteristic of openness of this site has already been compromised. A further analysis by Smeeden Foreman in the context of these representations continues to maintain this opinion. Given the site is strongly defined with urban features, and there is a strong degree of enclosure, the loss of Green Belt would have little impact on the overall purposes of this designation. The Kirklees Green Belt Review (2011) clearly shows the level of enclosure and containment of the site. We are of the view that the rear of the existing properties fronting onto Roberttown Lane to the north should provide the revised physical boundary to the Green Belt in this area and this is clearly illustrated on the plan extract below from the Green Belt Review (2011).



Vehicle Access and Transport Effects

- 2.12 Fore Consulting has undertaken an initial Transport Assessment of both the vehicular access into the site as well as the traffic effects of the development.
- 2.13 The preferred means of vehicular access into the site would be from Roberttown Lane, however, there are potentially two other secondary access points from Stanley Road to the south and Richmond Park Avenue to the east that could also be used to create highway permeable development.
- 2.14 The Transport Assessment has identified three junctions on the highway network that may have a material impact. However, with appropriate mitigation it can be demonstrated that the impact of the additional traffic generated by the development can be adequately accommodated on the road network and should have no adverse impact on the safety and free flow of traffic.

Flood Risk and Drainage

- 2.15 From the Environment Agency's Flood Map the site is located entirely within Flood Zone 1 and therefore it is considered to be at low risk from watercourse and river sources. There is also considered to be a low level of risk from overland flows from adjacent land and service water flooding.
- 2.16 Ground conditions are unlikely to be suitable for soakaways and therefore surface water drainage is proposed to be stored in oversized pipes and detention basins on site in the lower north eastern area. The nearest suitable offsite watercourse (Tan House Beck) is located approximately 500m to the north of the site which eventually outfalls to the River Spen to the east. Our drainage consultant has recommended solutions that can provide a suitable system to enable and outfall to be provided to Tan House Beck.
- 2.17 Our drainage consultants have confirmed that the Waste Water Treatment Works at Mitchell Laithes has sufficient capacity to accommodate the scale of development proposed. In terms of the sewer network it has been established from the site survey that not all the site may be able to discharge directly into the combined sewer in Roberttown Lane via a gravity connection. Yorkshire Water have therefore agreed that a maximum of 60 properties may discharge into the 150mm diameter foul sewer in Richmond Park Avenue.
- 2.18 The technical assessment work that we have undertaken as part of the initial masterplanning work clearly demonstrates that there are no fundamental constraints

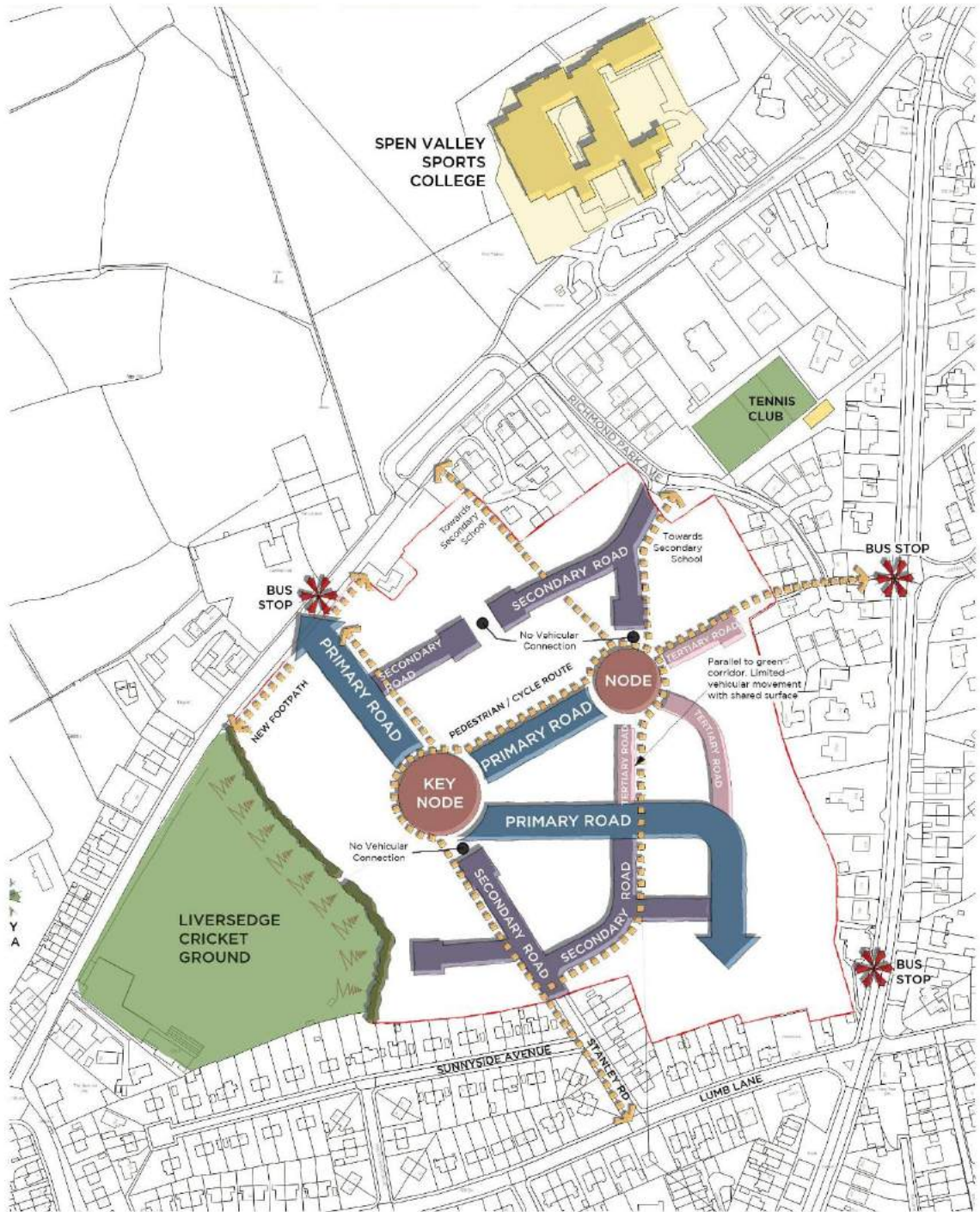
that would prevent the site coming forward subject to reasonable mitigation measures. As such the site is clearly deliverable particularly when considered in the context of it being promoted by a reputable regional housebuilder who is keen to commence construction.

Developing the Masterplan

2.19 Based on the understanding of the context of the site and the technical information which is summarised above, a series of Framework Plans were developed to demonstrate how the site could be developed for housing ensuring the protection and enhancement of landscape and ecological features as well as creating a place for people which is well connected and integrated into the surrounding area.

Movement Framework

2.20 The Movement Framework drawing sets out a clear vision for how vehicles and people could move around the development creating connectivity and circulation within and adjacent to the site. The primary access route is taken off Roberttown Lane running in a south to north direction aligning with the existing hedgerows. As recommended by the Transport Assessment two separate access roads could be taken from Stanley Road and Richmond Park Avenue. These potential access points would not be connected thus avoiding 'rat runs'. However, the routes could be designed to allow for pedestrians and cyclists to ensure permeability. The Framework Plan clearly demonstrates a permeable network of streets and footpaths creating an integrated development to encourage walking and cycling to access the wide range of facilities in the local area.

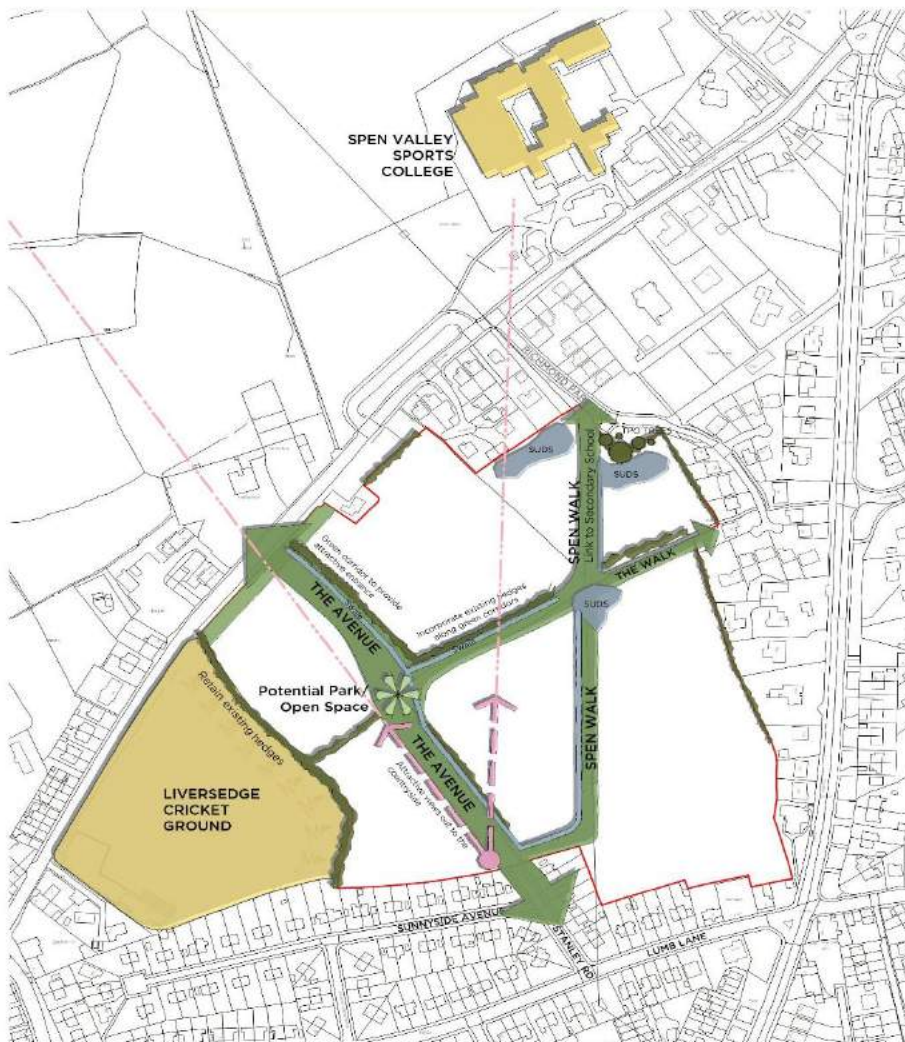


Movement Framework Land at Roberttown

 **SIGNET**
URBAN DESIGN
Scale: 1:2000 @ A3
Date: 09/10/2014
Drawing No: HG2435/005

Green Infrastructure Framework

2.21 The Green Infrastructure Framework drawing identifies opportunities to retain and enhance existing site features and provide new green spaces. There will be an opportunity to provide space to integrate the existing hedgerows as well as incorporate new planting, swales and dry detention basins. There is also the opportunity to provide a centrally located area of openspace including a play area. Existing hedgerows and trees on the perimeter of the site are shown to be retained and the north east corner is the lowest part of the site and is therefore the most suitable location to provide surface balancing ponds.



Green Infrastructure Framework
Land at Roberttown

 Scale: 1:2000 (R.A.)
Date: 02/10/2014
Drawing No: HG2435/006

Concept Framework

2.22 The Concept Masterplan drawing brings together with the work to date in terms of positively addressing potential constraints, identifying infrastructure requirements as well as creating its own unique identity. The key elements of the proposal are as follows:

- Roberttown Lane frontage – creating an attractive entrance into the development and retaining existing drystone wall;
- Spinners Way and the Green Way – these are the primary routes through the development and could have swales, hedges and street trees parallel to the road;
- The Circus – this would be a key feature space within the development incorporating openspace, play areas and pedestrian routes;
- The Courtyard/The Walk/Cotton Road – these are secondary streets that would have their own unique appearance.

2.23 The site measures 7.8Ha in size and it is envisaged that 1.2Ha of this would be set aside for greenspace accommodating balancing ponds, swales, green corridors, play equipment and informal openspace area.

2.24 The balance amounts to 6.6Ha (85% net area) and based on a density which reflects the surrounding area this would generate approximately 240 dwellings.



Up to 240 dwellings



Concept Masterplan Land at Roberttown

 **SIGNET**
 URBAN DESIGN

Scale: 1:2000 @ A3
 Date: 09/02/2014
 Drawing No: HG2435/010

Conclusions

2.25 The comprehensive assessment work we have undertaken to date provides strong evidence to demonstrate the suitability and deliverability of this site coming forward in the short term to support the required level of growth for the district. The Development Framework Report submitted to your Authority in October 2014 has demonstrated the site is sustainable and there are no major constraints associated with facilitating the required scale and mix of development. The masterplan process we have undertaken has ensured that a clear and systematic assessment of the issues has been undertaken to create a sense of place by maximising the opportunities of this site whilst positively addressing the potential constraints.

SECTION 3: ASSESSMENT OF ROBERTTOWN SITE (REF NO. H442 AGAINST LOCAL PLAN EVIDENCE BASE WORK

3.1 We have reviewed the various background evidence base documents associated with the draft Local Plan in the context of the work we have undertaken and is summarised in Section 2. Particular regard has been given to the following:

- Sustainability Appraisal Report prepared by LUC - September 2015;
- Rejected Site Options Report - November 2015;
- Kirklees SHLAA 2014;
- Green Belt Review and Outcomes.

3.2 Whilst it is appreciated that the above Local Plan evidence base provides a clear structure and framework to assess a significant number of sites, it is clearly important to bear in mind that this assessment still remains a very broad brush overview and the decision to choose one site over another comes down to a professional judgement which to an extent will be subjective in nature.

3.3 As set out in the previous section to our representations, the site at Roberttown (which we are promoting) provides more detailed technical and environmental assessment work beyond normally anticipated at this stage in the Local Plan process. This section of our representations, therefore, seeks to assess the work that we have undertaken and compares it against the analysis of your Council's evidence base work to support the Local Plan. Using the Sustainable Appraisal report as a basis, we have reviewed these SA objectives individually against our own professional judgement within the context of the additional technical information we have available. The following summary table responds to the Council's Sustainability Assessment for the site and identifies where the SA score should be improved as well as identifying any anomalies or discrepancies against the other evidence base assessment work undertaken by the Council.

3.4 Following the review and reappraisal of the Roberttown site, the next section in the representations (Section 4) will undertake a comparative analysis of similar Green Belt sites in the surrounding area that are either proposed to be allocated in the Draft Local Plan or have been rejected as potential housing opportunities. This will seek to

demonstrate that the Roberttown site should be considered as a preferred housing opportunity as it has one of the best sustainability credentials and can be delivered in the short term.

Sustainability Appraisal Review

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
1. Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	++	++	We agree with the Council's assessment of this objective.
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	0	0	We agree with the Council's assessment of this objective.
3. Ensure education facilities are available to all.	++?	++	We would agree that the site is highly accessible to both primary school and secondary school locations. It is interesting to note that the SA does not address capacity of the local schools to accommodate new pupils. However, capacity seem to feature within the Rejected Site Option report which suggests there is a need for additional capacity within the catchment area as the site is over 50 dwellings or above. As the provision of school places will be delivered through the CIL infrastructure mechanism, it is considered that greater weight should be given to the SA relating to the location of school facilities in relation to the site.
4. Improve the health of local people and ensure that they can access the health and social care they need.	+	+	We support the positive score.
5. Protect local amenity including avoiding noise and light pollution.	--	0	The SA describe the site as aligned directly adjacent to the A62 (Huddersfield Road) which could result in future residents being exposed to noise over the long term. We consider this is not a true representation of the site as there is existing properties fronting the A62 and this buffer will reduce the noise issue associated with the site. Whilst the site has a strong relationship to the existing

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
			residential properties, the rationale that these residents would be exposed to noise and light pollution during construction should not be given significant weight as appropriate conditions would be imposed during the construction phase of the development and it would only be for a temporary period. We recommend that the effect of amenity on either the prospective or existing residents would be negligible and so should be graded on this basis. From the Rejected Site options matrix Environmental Protection is graded Amber on the basis that the presence of constraints such as land contamination or proximity to serious noise sources such as motorway but where mitigation could be achieved. Based on our evidence we would recommend that it should instead be graded green (i.e. no significant constraints).
6. Retain and enhance access to local services and facilities.	+	++	We would agree that the scale of development could potentially stimulate the provision of local services and facilities and there is clear recognition that the majority of the site is within five minutes travel time of a local centre. We consider that a significant positive effect is likely.
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	0	+	As is clear from the masterplanning work we have undertaken, the layout has had regard to incorporation of greenspace which would have a high level of surveillance to increase the perception of personal safety. Therefore, through the masterplanning work we have done the certainty should increase the score to a minor positive effect.
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	++ / - -?	++	Similar to above, the detailed masterplanning work undertaken has demonstrated that the layout is able to provide new recreation facilities and areas of open space which have a multi-functional use. The Council's grading appears to be

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
			mixed based on the potential impact of two PRow footpaths within the site but again the layout has accommodated these uses in order to create a highly permeable and accessible development. Therefore, we consider a significant and positive effect is likely.
9. Ensure all people are able to live in a decent home which meets their needs.	++	++	We would agree with the Council's SA score as the housing development can provide a range of house types as well as proportion of affordable housing.
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	++	++	We would agree that the site is highly accessible by a range of sustainable modes of transport to key services and facilities.
11. Secure the efficient and prudent use of land.	--	-	It is recognised that there is now insufficient housing land to fulfil the identified housing need on previously developed land only. Whilst there is a predicted negative score against this objective, it is clear the Council would need to release greenfield sites to meet the housing need. As the site is in an accessible location and the majority of the site is not within an area of quality agricultural land, the site should be seen as the first priority to direct development.
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	--?	-	Smeeden From the Smeeden Foreman Assessment in concludes there is a moderate landscape structure, however, rural features are few.
13. Protect and enhance the historic environment, heritage assets and their settings.	?	0	The Council have not scored this issue given the potential uncertain impacts on the Old Hall Farmhouse Grade II* Listed Building. This is situated to the north of the site on the opposite side of Roberttown Lane and we consider it is not part of its immediate setting. Furthermore, the masterplan layout shows a strip of landscape planting along Roberttown Lane to screen views of the site from the north. Based on this additional level of detail we consider that the site will have a negligible impact on this SA objective.

SA Objectives	SA Score (Council)	SA Score (Signet)	Signet Comments
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	0?	0	As a result of the Phase 1 desk top assessment survey, as well as the mitigation measures identified within the masterplan there are no sensitive ecological or biodiversity issues. As such, the development will have a negligible impact on this SA objective.
15.Reduce air, water and soil pollution.	0	0	As the site is not within or directly adjacent to an AQMA, we would agree that there would be a negligible effect on this SA objective.
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	-	0	Whilst the site is on greenfield, the entire site is located within Flood Zone 1. Furthermore, the masterplanning work has confirmed that both surface water and foul water can be drained in a suitable manner. The site is, therefore, likely to have a negligible impact on this SA objective.
17. Increase prevention, re-use, recovery and recycling of waste close to source.	-	0	We are of the opinion that the site would ensure the recycling of waste close to source and therefore development is likely to have a negligible impact on this SA objective.
18. Increase efficiency in water, energy and raw material use.	0	0	It is agreed that in relation to this issue, the site will have a negligible effect on the SA objective.
19.Reduce the contribution that the district makes to climate change.	++	++	It is agreed that the site is well connected by sustainable transport links and therefore levels of car use are likely to be lower.

Key	
++	The option is likely to have a significant positive impact on the SA objective(s).
+	The option is likely to have a positive impact on the SA objective(s).
0	The option is likely to have negligible or no impact on the SA objective(s).
-	The option is likely to have a negative impact on the SA objective(s).
--	The option is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect of the option will have on the SA objective(s), due to a lack of data.
+/-	The option is likely to have a mixture of positive and negative impacts on the SA objective(s).

3.5 In summary, we would maintain that the Roberttown Road site scores well within the Sustainability Appraisal prepared by the Council and the further level of technical detail we have produced and referred to in this section clarifies and provides more certainty which elevates its position in the overall rankings as well as give the necessary degree of confidence that the site in overall terms is both suitable and deliverable and should come forward as a housing allocation within the draft Local Plan. We would maintain that to deliver the fully objectively assessed housing need for the area based on the spatial distribution proposed within the draft Local Plan then developing on the most sustainable and unconstrained sites will be a necessity.

SHLAA Delivery Review

3.6 In addition to the SA score, the site has been graded in the context of the SHLAA 2014 study against suitability/availability and achievability. The site is identified as Reference 812 and the conclusions of the SHLAA assessment are as follows:

- **Suitable:** Amber – potential contamination in the north of the site and overhead power lines cross the site.
- **Available:** Green – owners support development.
- **Achievable:** Amber – costs should be offset for a site of this size.

3.7 The phasing matrix of the SHLAA 2014 study shows the site as falling within 0-5 years and also 6-10 years.

3.8 Based on our detailed masterplan work already undertaken we have reviewed this assessment and our revised approach to these criteria are as follows:

- **Suitable:** Green - Whilst there are overhead power lines that cross the site, the detailed masterplanning work we have undertaken ensures that there is sufficient standoff distance to deal with this constraint whilst creating ensuring an acceptable net developable area. Whilst we have yet to undertake a land contamination assessment, we are unaware of any potential contaminated land but we consider this to be of very low risk in any event given the greenfield character of the site.
- **Availability:** Green - As Strata Homes have entered into a land option arrangement with the landowner to promote the site for housing, the site is immediately available.

- **Achievable:** Green - Strata Homes have undertaken some initial high level viability assessment work based on the proposed land uses identified within the masterplanning work. They are not aware of any abnormal costs that are associated with site preparation. It is also our view that the broad market area and local market conditions are strong which makes the site an attractive location for housing as borne out by the promotion of this site by a housebuilder.

3.9 Based on our revised assessment of the SHLAA criteria, the site analysis would be 'green' for suitability, availability and achievability. This is further evidenced to demonstrate that the site would be deliverable in the short term i.e. within five years and would therefore be able to make an immediate contribution to the Council's housing need which is an important consideration.

Green Belt Review

3.10 We have also re-examined the site in the context of the Green Belt Review and outcomes and the two tests that the Council have undertaken. It would seem from Paragraph 4.2 of the Green Belt Review and Outcomes that the favoured approach is to review the Green Belt edge and the land immediately adjacent to it. However, from the associated plans, the focus is associated more with the Green Belt edge and it becomes unclear from the assessment as to how much consideration has been given to the adjoining land parcels. We consider this approach is a weakness in the assessment. Specifically the test does not attempt to establish where new Green Belt boundaries could be defined. However, Paragraph 83 of the Framework confirms that Green Belt boundaries can be altered through the preparation or review of the Local Plan and at that time, Local Authorities should consider the Green Belt boundary having regard to their intended permanence in the long term so that they could be capable of ensuring beyond the Plan Period. Whilst the Green Belt edges provide a useful starting point, 'general areas' or parcels and their potential revised boundaries beyond existing boundaries should be tested. Another criticism is the clear separation between the Green Belt Review and the SHLAA process. We consider that this process needs to align more closely particularly as a key reason for the review of Green Belt is based upon accommodating future housing need.

3.11 The landscape consultants undertook an initial Landscape and Green Belt Assessment in 2014 for the site and have undertaken further assessment work as part of these representations having regard to the Council's evidence for assessing not only the

Roberttown site but also sites of a comparable scale and nature within the surrounding area. For the Roberttown site they have reached the following conclusions:

- In terms of the site's contribution to the landscape character, the site is influenced by a high degree of containment from adjacent urban features. The edge is considered to be strongly urban rather than the transitional character expected in the urban fringe. Views are limited by development and topography. Whilst there is a moderate landscape structure, there are relatively few rural features such as hedgerows and mature trees.
- The settlements of Roberttown, Liversedge and Norristhorpe have already merged as a consequence of ribbon development along Roberttown Lane and the A62.
- There is a high degree of containment as a consequence of a strong urban edge and road network. Furthermore, the cricket pitch to the south is also further separated from the rest of the site by landform and vegetation. Existing housing along Roberttown Lane already separates the parcel of land from the adjacent more sensitive Green Belt parcel to the north.
- In so far as safeguarding the Countryside from encroachment we consider that there is significant urban influences within the site and the prominence of existing housing surrounding it diminishes its relationship to the wider Countryside setting.

3.12 Based on our Green Belt assessment, we have identified a revised Green Belt boundary to compliment the release of the Roberttown site to support housing development but also appreciated the guidance in the Framework.

3.13 We propose that the revised Green Belt boundary should relate to the rear boundaries of the existing ribbon development that is situated on the north side of Roberttown Lane. As such, the Roberttown Lane site, the properties to the north of Roberttown Lane together with the Cricket Ground would be excluded from Green Belt control. To protect the Cricket Ground from any development pressures, there would be the option of identifying this recreation facility as Urban Greenspace. It is also interesting to note that within the consultation on the proposed changes to the National Planning Policy there is encouragement on redeveloping brownfield land in the Green Belt which would not be inconsistent with the approach of including those existing properties that lie immediately to the north of the Roberttown Lane.

SECTION 4: COMPARITIVE ASSESSMENT OF ALTERNATIVE HOUSING SITES

- 4.1 In the previous section we have reviewed the Council's grading and scoring of the Roberttown site found within the various evidence based documents that have been produced. Whilst we appreciate that the scoring system around the tests and criteria the Council have used requires a professional judgement, in our opinion and based on the more detailed evidence work we have undertaken, a number of the scores improve for sustainability, suitability, achievability and availability as well as against the purposes of Green Belt.
- 4.2 Our re-appraisal and assessment work of the Roberttown site provides the basis upon which to undertake a comparative analysis with other sites of a similar scale and nature to the Roberttown Lane site. The Location Plan and three tables in Appendix 1 identifies those housing sites that have been assessed and they have been chosen on the following basis:
- They are situated within the Batley Spen Sub area;
 - The majority can accommodate over 100 dwellings on site;
 - They are currently designated statutory Green Belt;
 - The assessment includes both accepted allocations proposed within the draft Local Plan but also rejected options.
- 4.3 Similar to Section 3 (which focused on a specific assessment of the Roberttown site) the alternative sites have been reviewed against the key issues found within the Sustainability Appraisal; the deliverability information provided by the SHLAA; and the Green Belt review. In all cases, we have reviewed the Council's evidence base and provided our own professional interpretation based on our own knowledge and judgement. We consider this information provides important tools to undertake a comparative exercise as it involves a broad spectrum of relevant criteria.
- 4.4 As part of this comparative analysis, Smeeden Foreman have been commissioned to produce a partial review to analyse rejected and accepted housing options so that a comparison can be made between similar sites. This report is provided as a separate standalone document but should be read in conjunction with these representations.

- 4.5 The assessment tables relating to the Sustainability Appraisal and the SHLAA information for the identified alternative sites can be found at Appendix 1.
- 4.6 Table 3 contains the summary comparison information so that sustainability principles, deliverability and our Green Belt Assessment can be seen in one location.
- 4.7 In so far as the Signet SA Score Summary is concerned, this seeks to quantify the number of times a specific grade/category is scored for each site. These categories range from 'significant positive impact' (++) through to a significant negative impact (--) as well as registering those aspects that may have an uncertain effect on a specific SA objective or a mix of positive and negative impacts are identified.
- 4.8 From our assessment of the Roberttown site (H442) it performs well with a score of 7 'significant positive impacts' and 2 'positive impacts'. 8 of the objectives attract a score of 'negligible or no impact' with the remaining 2 objectives out of a total of 19 would like to have a 'negative impact'. These relate to efficiency of land use and impact on the landscape. It should also be borne in mind that as a result of the level of detailed evidence we have already undertaken and submitted to the Local Authority to support this proposed allocation, this removes the degree of uncertainty particularly as there is already an outline of the package of mitigation measures and/or enhancements to ensure that the SA objectives can be achieved.
- 4.9 It is appreciated that many of the proposed allocated sites have reasonably SA positive scores but equally we have identified a range of negative, mixed impacts and uncertainties which means that these sites do not outperform the Roberttown site.
- 4.10 Similarly, none of the rejected sites are able to match the sustainability credentials of the Roberttown site. The score for these tend to be skewed more towards the 'negative impacts' with many SA objectives identified as being uncertain or a mix of positive and negative impacts.
- 4.11 Another key aspect of whether a proposed allocation is appropriate for consideration is its overall deliverability and the SHLAA (2014) provides a starting point to determine in which time period sites are likely to deliver residential development based on a combination of the suitable, achievable and available assessment.
- 4.12 In Section 3 we have already justified that the Roberttown site is deliverable without any constraints and is able to deliver units at an early stage in the Plan Period (0-5 years). It is interesting to note from our summary Table 3 in Appendix 1 many of the proposed allocated sites have specific issues around the criteria set out within the

SHLAA evidence base: For example Site H198 and H218 would appear to be unable to come forward for development until between 6-10 years.

- 4.13 As housing growth is required within Kirklees within the short term, it is important to allocate sites that are able to demonstrate an early release which is a main advantage of the Roberttown Lane site. Many of the rejected sites do not feature within the SHLAA 2014 document and so it is difficult to undertake a comparison with our site.
- 4.14 The final column of Table 3 in Appendix 1 considers whether the site should be released within Green Belt and this should be seen in the context of the work and evidence found within the Green Belt analysis prepared by Smeeden Foreman and their own comparison table of the relevant sites found at Page 32 of that report.
- 4.15 The Smeeden Foreman Report specifically identifies two of the proposed allocated sites (H218 and H564) as having a substantial impact on the purposes and function of Green Belt that would be to a greater extent than the Roberttown site.
- 4.16 Our Green Belt Review Assessment for Site H218 reveals that it could be highly visible from the surrounding countryside and roads. Development on this site could diminish the visual connection to the wider countryside from the west of Birkenshaw and have a negative impact on the setting of the village.
- 4.17 In terms of Site H564 our Green Belt Review have demonstrated that development would introduce urban features to sloping ground which is considered more rural in character within the local area. As such the openness of the adjoining land parcels would be negatively affected and so this site should remain in the Green Belt.
- 4.18 The Smeeden Foreman Green Belt Review systematically looks at the rejected sites within the location around the Roberttown Site and concludes that having regard to the Green Belt purposes they all make a significant contribution and so should not be released from Green Belt.
- 4.19 In conclusion, the comparative assessment work of sites of a similar scale and nature to the Roberttown Lane site within this area of Kirklees demonstrates that it performs better in terms of its contribution to delivering sustainable development. It can be delivered in the short term and would not compromise the purposes of Green Belt particularly when compared to the other proposed sites under consideration.

SECTION 5: ASSESSMENT OF HOUSING NEED

Introduction

- 5.1 It is considered that the Local Plan's housing requirement is set too low.
- 5.2 The number of homes required over the 2013 - 2031 period has been derived from the Kirklees assessment of housing need (29,340 homes, or an average of 1,630 per year), which is based on 2012 based Sub National Population Projections. However these have been heavily criticised for the use of migration assumptions that have underestimated the scale of international migration. Furthermore, the assessment does not reflect the economic aspirations of the Council expressed in either the emerging Local Plan or the Strategic Economic Plan (SEP) of the Leeds City Region.

Kirklees Strategic Housing Market Assessment

- 5.3 The Draft Local Plan identifies a housing need figure of 1,630 dwellings per year. This figure has been derived from the Kirklees Strategic Housing Market Assessment which has used a series of growth scenarios as part of the analysis (15 in total). These have been 'benchmarked' against the 2012 based ONS population projections. The scenarios used include the 2010 based ONS population projection (for comparison purposes), trend based forecasts relating to alternative migration assumptions, and jobs led growth scenarios. 5 of the scenarios are jobs led sensitivity tests which looked at different unemployment levels and headship rates. The scenarios and their respective dwelling requirements are presented in the table below:

Kirklees household scenarios and dwelling requirements 2013-2031

Rank	Scenario	Annual dwelling requirement
1	Jobs led 80% employment rate	2,191
2	PG 10 year	1,995
3	Jobs led Y&H Economic Model + Kirklees Economic Strategy	1,919
4	Jobs led 80% employment rate (sensitivity test)	1,909
5	PG 5 year	1,883
6	Jobs led 75% employment rate	1,730
7	Jobs led Y&H Economic Model	1,662
8	Jobs led Y&H Economic model +KES (sensitivity test)	1,641
	Objectively assessed need figure	1,630
9	SNPP 2012	1,520

10	SNPP 2010	1,513
11	Jobs led 75% employment rate (sensitivity test)	1,454
12	Jobs led Y&H Economic Model (sensitivity test)	1,387
13	Natural change	1,373
14	Jobs led trend employment rate	1,340
15	Jobs led trend employment rate (sensitivity test)	1,069

5.4 The different growth scenarios have a requirement of between 1,069 and 2,191 dwellings per year. The objectively assessed need figure is based on the cumulative annual dwelling total derived from the jobs led growth scenarios which has then been divided by the number of scenarios used in the assessment (10). The calculation 16,302/10 arrives at 1,630 dwellings per year.

5.5 Later in the SHMA report, a further explanation is given which states that the 1,630 figure is based on the baseline figure of 1,520 dwellings per annum (the 2012 SNPP household projection from ONS), which has then been adjusted to add 110 dwellings per year in order to reflect jobs-growth.

5.6 However, the exercise raises a number of questions relating to the scenarios used in the assessment. There are concerns over the SNPP 2012 baseline figure, as the ONS population projections have already been heavily criticised for the use of migration assumptions that are viewed to be unrealistic. .

2012 SNPP Household Projections

5.7 ONS population projections appear to have as issue with migration, or rather the ability to accurately record international migration and therefore provide robust forecasts of future patterns.

5.8 Between 2001 and 2011, 'unattributed population change' (or growth) was significant. ONS could find no clear evidence to suggest whether the discrepancies were in the Census numbers or in the estimation of migration flows between Census years. However they nevertheless concluded that, based on the accuracy of the UK's registration systems for births and deaths, it is likely to be a result of under estimating international migration.

5.9 Despite adjustments to population change in 2011 and the work ONS has undertaken to improve the estimation of international migration flows, there remains an issue. ONS has commented that international migration estimates have been amended to account for 'unattributed population change' in the 2012 SNPP. However, it was

widely reported earlier this year that the 2012 based SNPP had under estimated net in-migration in the UK by 170,000 people over the 2 years of April 2012 – March 2014. More recently, the ONS Statistical Bulletin for August 2015 identifies that in the 12 month period to the end of March 2015, net migration was 94,000 greater than forecast.

The above questions the validity of the ONS 2012 SNPP Household projections as representing a firm and proper baseline position for calculating housing need.

Adjustments to 2012 SNPP housing growth scenario

- 5.10 Having regard to the ‘under estimation’ of UK net migration for 2014 – 2015 of 94,000 and the ‘under estimation’ for 2012 – 2014 of 170,000 (a crude average of 85,000 each year), a proportion of this additional migration would be relevant to Kirklees, particularly as the migration patterns that are recorded by ONS reveal that in-migration is from those countries that have well established communities in Kirklees – Eastern Europe and India/Pakistan. Assuming very crudely that the ‘under-estimation’ is distributed across the UK in a way that is proportionate to its population, then Kirklees would account for 587 persons per year over the 2012 – 2015 period. Applying average household size (2.3) identifies 255 additional households (dwellings) per year. However, it is unrealistic to expect such a distribution. As discussed above, the likely scenario will see international in-migration focus on urban areas and specifically on areas where particular ethnic communities are already located. The 255 dwellings per year for Kirklees is therefore likely to be an underestimate.
- 5.11 In response to the level of international in-migration recorded by ONS and the regular pronouncements of ‘under estimating the scale of flow’, the Government has promulgated that it will reduce net annual international migration to under 100,000 by 2020 (a reduction of more than 70%). If achieved, this will mean a ‘scaled down’ housing requirement, but there is as yet no indication as to how this will be achieved, particularly as any dramatic curtailment of for example, European citizen movement into the UK will directly conflict with European legislation (the Maastricht Treaty). Until known, a housing growth scenario adjusted to account for what appears to be a pattern of ‘under estimating’ net migration should be introduced.
- 5.12 If the figure of 255 dwellings per year referred to in paragraph 9 above is added to the 2012 SNPP dwelling requirement of 1,520, this would provide a revised figure of 1,775 dwellings, which should then represent a more accurate baseline position.

- 5.13 Adjustments to the baseline position will also impact upon each of the housing growth scenarios, as the demographic forecasts for the Leeds City Region and Kirklees Local Authority area undertaken by Edge Analytics are qualified by the comment that household and dwelling growth outcomes have been calculated using the 2012 based household assumptions. Therefore adjustments to the pattern of international migration will in turn see an increase in the dwelling requirements under each of the housing growth scenarios. Consequently, the Council's 'objectively assessed' housing need figure of 1,630 per annum falls short of the level of housing required in Kirklees.
- 5.14 It is interesting to note that Edge Analytics, in their report of September 2014 (Kirklees Demographic Analysis and Forecasts) comment in paragraph 3.9 that whilst a 5 year historical period is a typical timeframe from which migration trend assumptions are derived, due to the economic changes that occurred after 2008 and the differences between the historical migration data and 2012 SNPP assumptions, consideration should be given to an extended historical time period. The scenario reflecting this extended historical time period is PG 10 Year, which identifies an annual dwelling requirement of 1,995 which is 365 greater than the Council's 'objectively assessed' figure. Whilst this paper doesn't necessarily advocate that we should adopt the PG 10 Year growth scenario as a baseline position, it does however recommend that a pattern of growth that more accurately reflects the migration patterns that are now being recorded by ONS should be recognised.

Kirklees Economic Strategy and the Strategic Housing Market Assessment

- 5.15 The Vision for the Kirklees Economic Strategy is for '**Kirklees to be recognised as the best place to do business in the North of England**', and where '**people prosper and flourish...**' There are six headline initiatives for driving economic change and transformation in the district:

- **Consolidate Kirklees as the heart of a growing innovative manufacturing and engineering cluster in the Leeds City Region**
- **Maximise the impact of a suite of high quality innovation and enterprise assets**
- **Enhance enterprise, skills and opportunities for young people**

- **Strategic employment sites to stimulate jobs and growth, with focus on manufacturing and engineering**
- **Revitalise Huddersfield town centre**
- **Kick start the transformation of Dewsbury**

5.16 These headline initiatives are closely aligned with the priorities in the Leeds City Region Strategic Economic Plan (SEP). However their successful implementation is reliant on (inter alia) having the necessary support infrastructure in place. This is not just the employment land, utilities and services to accommodate new development, it is also the availability of quality (and affordable) housing to support the workforce that will drive economic growth. Both the Leeds City Region SEP and the Kirklees Economic Strategy acknowledge this.

5.17 The SEP comments that **'If the City Region is to meet its long term economic ambitions, there will be a need for a significant increase in the availability of high quality homes for families, entrepreneurs, and other individuals'** The Kirklees Economic Strategy, reinforces the point, highlighting the importance of creating housing opportunities and ensuring there are sufficient numbers of quality houses to support the economic growth of the district. Under **'Priority Four: Infrastructure'**, the Kirklees Strategy comments that an **'insufficient supply of housing can restrict labour market mobility, exacerbate inequality and constrain economic growth'**. Furthermore, it goes on to say that **'housebuilding can create jobs and wealth, not just in the construction sector, but also through widening the local labour market and consumer base and kick starting regeneration'** Therefore new housing is as important to economic growth and expansion as the availability of new employment land.

5.18 The Leeds City Region SEP was agreed with Government in 2014 with the stated ambitions to double the rate of housebuilding within the region, to deliver £5.2 billion in additional economic output and an extra 62,000 jobs by 2021 (over and above the £7.4 billion of economic output and 52,000 jobs to be created based on forecasts at the time).

5.19 The Kirklees employment target in the Draft Local Plan is for 32,200 new FTE jobs over the 2013 - 2031 Local Plan period, which (if proportionately reduced to reflect the shorter timeframe of the SEP) equates to 12.6% of the new jobs to be created within the Leeds City Region. By comparison, Kirklees currently accounts for 14% of total employment and 14% of total businesses in the Leeds City Region¹. Having regard to the above, and bearing in mind:

- (i) 2 of the City Region's Strategic Employment sites are located within the Kirklees district - Chidswell near Dewsbury and Cooper Bridge near Mirfield,
- (ii) A key focus of the Kirklees Economic Strategy is attracting new businesses in the sectors of advanced manufacturing (encouraged by the district's strong manufacturing tradition), and
- (iii) the district benefits from the presence of Kirklees Technical College and specifically Huddersfield University (recognised as one of the leading universities in the country with particular strengths in engineering, metrology, enterprise and innovation),

The Draft Local Plan should have a more ambitious employment target that better reflects the Kirklees Economic Strategy's economic aspirations. The ONS records that following the economic recession, 'trend based' employment growth in Kirklees (over the last 5 years) has averaged 1,900 per annum. Furthermore, around 400 new enterprises have been established in the district each year over the same timeframe.

5.20 It is considered that a higher employment target for Kirklees should be set - one that does not underplay the district's role within the Leeds City Region, particularly as employment growth will be supported by a raft of initiatives and funding through the Leeds City Region SEP. However an increase in forecast employment growth will in turn have an impact on housing requirements, as recognised by the SHMA, which uses a variety of jobs-led growth scenarios in the forecasting model.

¹ NOMIS: 2015 Business count and labour supply statistics for each local authority within the Leeds City Region

5.21 The jobs-led projections of housing requirements in the SHMA comprise 10 scenarios, although 5 relate to sensitivity testing of the core scenarios. The core jobs led scenarios used in the SHMA are:

- Jobs Led Regional Economic Model
- Jobs Led Trend Based Employment Rate
- Jobs Led 75% Employment Rate
- Jobs Led REM + Kirklees Economic Strategy
- Jobs Led 80% Employment Rate

5.22 A technical paper produced by the Council entitled 'Employment Needs Assessment' (dated November 2915) concludes that the 75% employment rate '**...is a realistic aspiration, and one that meets the identified needs of the district.** The Technical Paper goes on to say that the Council is satisfied that the 75% employment rate '**... is the preferred approach to deliver the overarching economic objectives for Kirklees'** (paragraph 4.23).

5.23 Of all the Jobs-led housing growth scenarios, the 75% Employment Rate is therefore the most compatible with the Kirklees Economic Strategy. This identifies a dwelling requirement of 1,730 per year – 100 more than the objectively assessed need figure of 1,630 dwellings. However the figure **excludes** 'adjustments' that are necessary to compensate for underestimates of net migration in the 2012 based SNPP which forms the basis of the housing model. These 'adjustments' will increase the dwelling requirements under each of the housing growth scenarios. Consequently, the Council's 'objectively assessed need' figure of 1,630 falls well short of the level of housing required in Kirklees.

5.24 In terms of other Jobs led scenarios, the Trend Based Employment Rate is considered to be unrealistic simply because it is based on a pattern of job creation which principally reflects employment activity during the double dip economic recession that occurred in the UK over the 2007 to 2011 period. Jobs growth for this scenario is therefore very subdued over the timeframe of the SHMA, which conflicts with the pattern of employment observed since the emergence from recession.

5.25 Similarly, the 'Natural Change' scenario is unrealistic (where in and out migration rates have been set at zero). Having regard to the pattern of Natural Change that has been recorded in Kirklees over the last 15 years, and which ONS has forecast for the local

authority over the next 20 years, zero Natural Change is a misnomer for the Kirklees district.

- 5.26 The 'Natural Change' scenario, the 'Trend Based Employment' scenario (and Sensitivity Test), along with 2 other Jobs-Led scenarios (Yorkshire and Humberside Economic Model Sensitivity Test and 75% Employment Rate Sensitivity Test) all identify housing requirements that are less than the 2012 SNPP baseline need figure of 1,520 dwellings per year. These 'low output' scenarios have nevertheless been included in the SHMA housing needs model, and as a result have contributed to the calculation of an 'objectively assessed' housing requirement that is skewed towards the lower range of dwelling requirements, hence the Council's 'objectively assessed need' figure of just 1,630. The inclusion of these growth scenarios is considered to be inappropriate.

Conclusion

- 5.27 The assessment of housing need over the 2013 - 2031 period does not reflect the economic aspirations of the Council expressed in either the emerging Kirklees Local Plan or the Kirklees Economic Strategy. The 'objectively assessed' housing need figure of 1,630 dwellings per year (or 29,340 homes over the plan period) falls short of the 75% Employment Rate scenario of 1,730, which is considered by the Council's Employment Needs Assessment to be **'the preferred approach to delivering the overarching economic objectives for Kirklees'**.
- 5.28 The assessment of housing need should also be re-evaluated to more accurately reflect the migration patterns that are being recorded by ONS. The 2012 based Sub National Population Projections have underestimated (to a significant degree) international in-migration, and the household and dwelling growth forecasts for the Leeds City Region, and Kirklees Local Authority area are based on 2012 based household assumptions which in turn use the 2012 based Sub National Population Projections.
- 5.29 Therefore, to ensure that housing need in Kirklees is not underestimated (i) adjustments to the 2012 based household projections are required to more accurately reflect changes to the pattern of international in- migration, and (ii) the use of a jobs-led housing target that more accurately reflects the economic aspirations of the Kirklees Draft Local Plan and Kirklees Economic Strategy are needed. Each will increase the Council's current 'objectively assessed' housing need figure presented in the Draft Local Plan. To ignore both of these matters would see the Council

undermine its ability to address one of the key issues identified in the Draft Local Plan
- **‘What provision should be made for new jobs and homes?’** (Issue 2: Issues facing
Kirklees, Kirklees Draft Local Plan).

SECTION 6: SUPPLY SOURCE ASSESSMENT

- 6.1 As part of our response to addressing housing need, we have already identified that in order to achieve an aspiration economic growth that aligns with your job creation the amount of housing required would be greater than you have identified in the draft Local Plan. Clearly this level of growth will have implications regarding the spatial housing options from the various supply sources and allowances that have been estimated.
- 6.2 This section carefully reviews the supply and sources of housing identified within the Housing Technical Paper (November 2015). Following our assessment, we produce a summary table at the end of this section which is a modified version of Table 3 found within the Technical Housing Paper to include additional columns with our comments that challenge the assumptions the Council have adopted.

Sites with Planning Permission

- 6.3 As at 31 March 2014, the Council advised that 6,350 homes have yet to be built on site with existing planning permission in Kirklees. However, the Council have not applied any discount rate to sites with planning permission to account for under or non-delivery from such sites. It is unlikely that all the identified sites will be developed particularly those on brownfield sites as they can be subject to a whole series of constraints, abnormal costs as well as marketing and viability issues. To create some degree of flexibility and realism we would suggest that there should be allowance of 10% reduction for these sites already committed with planning permission and not yet started. The 10% reduction is consistent with a number of appeal decisions such as at Rothley and Honeybourne.

Windfall Allowance

- 6.4 The Council claim that the total number of new homes built on a windfall site since 1999/2000 (excluding residential gardens) was 13,633 (an average of 908 dwellings per annum). Whilst the draft Local Plan does not incorporate a windfall allowance for the period 2013 to 2021, a windfall allowance of 450 dwellings per annum for the final ten years of the Plan Period has been included. This is still a significant amount over the Plan Period and failure to achieve this figure would place the delivery of the plan under serious threat.

6.5 We would agree that the delivery from windfalls will reduce in future years compared to the past trends. This is due to the effect of having an up to date plan with allocations and a more robust and fine grain evidence base through the SHLAA. However, we consider that the estimate allowance suggested by the Local Authority is an over estimate. It is our view that the main source of housing windfall supply will be generated by small scale opportunities. We do not consider an allowance for large windfall sites should be identified given a thorough Call for Sites process has taken place and these have been accounted for as part of the Local Plan allocation process. On this basis, we would recommend that a windfall allowance should focus on small sites for the final ten year period and we consider a figure of 200 dwellings per annum is reasonable although prior to committing to any allowance the Council should provide further evidence upon the likelihood of the future rates of windfall delivery over the Plan Period.

Allowance for Losses

6.6 Based on the evidence set out in Table 5 of the Housing Technical Paper it is clear that there has been an average loss of approximately 90 dwellings per annum and we agree that this figure should be factored into the overall housing supply source calculation.

Flexibility Rate

6.7 Table 3 provides a 5% flexibility rate of the land to be allocated in the Local Plan. It seems that the origin of the 5% buffer relates to Paragraph 47 of the Framework in relation to the five year land supply calculation. In Paragraph 7.23 of the Draft Plan there is also recognition that where there is a persistent record of under delivery of housing then a 20% buffer should apply. From Table 2 within the Housing Technical Paper it is clear from the net annual housing completion rates compared to the housing requirement there has been a shortfall every year since 2007/2008 (a five year period). Against this track record, we would suggest that Kirklees has a persistent record of un-delivery of housing and this should be reflected in the supply.

6.8 It is interesting to note that Rotherham Council have recently consulted on their Sites and Policies Publication Draft Version and they have chosen to allocate a greater number of dwellings and this represents a buffer of around 9% of the planned requirement. Reference is also made to Paragraph 6.11 of the Draft Kirklees Local Plan which applies a 10% flexibility of the employment supply to add a flexibility allowance for the market and to account for the non-delivery of prime sites.

6.9 For the purposes of assessing the housing supply, we would recommend that a flexibility rate of at least 10% is introduced.

Delivery and Implementation

6.10 Within Appendix 3 of the Local Plan there is a table entitled housing delivery and phasing and this identifies the likely completion rates to calculate the annual housing trajectory rates over the lifetime of the Plan Period. It is important that the draft Plan does not include a specific housing allocation phase and policy as this approach could place an unnecessary constraint on housing delivery in Kirklees. This is an important consideration given the clear objective to seek to boost the delivery of housing to support the economic ambitions of the district and the City Region as a whole.

6.11 It is clear from Figure 7 entitled Housing Trajectory identified in the Local Plan that over the next few years there will continue to be limited growth envisaged below the projected annual housing need. Unless there are a wide choice and range of housing sites available in strong market areas then there is a real danger that the significant uplift in delivering growth required to support the economic ambitions of the district fails to be achieved.

6.12 The draft Local Plan seeks to bring forward three strategic housing allocations at:

- Land north of Bradley Road (1,974 dwellings);
- Land east of Leeds Road, Chidswell, Dewsbury (1,535 dwellings);
- Land to the south of Ravensthorpe Road, Thornhill Lees, Dewsbury (4,000 units).

6.13 Based on the housing trajectory within Appendix 3 all three sites would appear to start delivering units at the maximum rate from 2017-2018. At Signet Planning we have experience of dealing with the promotion and delivery of strategic allocations and we consider the estimates start on site proposed by the Council is too optimistic, particularly for Chidswell and Bradley Road as neither of these have a developer associated with the project and indeed for Bradley Road there has been no masterplanning work commissioned to date. We would argue that for both these sites, the delivery of units is unlikely to commence until at least 2020 and therefore a further 500 dwellings should be removed from the sources of potential housing sites within the Plan Period. This is still an optimistic assumption based on the Urban Extension Assessment of Delivery Rates Report prepared by Savills on 31 October 2014 which

referred to a study by Hourigan Connelly for Gladman Developments say the indicative timescales from formal allocation to start on site was 5.3 years.

- 6.14 Given the increase in the amount of housing supply we have identified and the trajectory rates not delivering the required level of growth to support the ambitions of the economy. It is important to release a range of deliverable sites in sustainable locations and we consider that the Roberttown site being promoted by Strata Homes is both suitable and deliverable to be considered as an integral part of the preferred housing growth option.

Summary of Supply and Sources of Housing

	Housing Supply Sources/Allowances	Explanation	Number of Homes	Number of Homes (Signet Planning)	Signet Comments
A	Housing requirement (from the Strategic Housing Market Assessment)	Housing required over the plan period (1,630 x 18 years within the period 2013-31)	29,340	32,400	Based on our assessment of AOHN it would be 1,800 x 18 years.
B	Net housing completions (2013/14)	New homes built in the first year of the Plan Period	-1,036	-1,036	No comment required.
C	Sites with planning permission at 01/04/2014	Remaining capacity on existing planning permissions	-6,350	-5,715	A 10% reduction to acknowledge that it is unlikely all consents will be delivered.
D	Windfall allowance	Allowance of 450 per annum (2021-31 only)	-4,500	-2,000	200 dph between 2021 - 2031 based on small windfall sites only.
E	Allowance for homes lost through demolition/change/ of use/conversion	90 per annum for remaining plan period (2014-31)	+1,530	+1,530	No comment required.
F	Sub-total of land to be allocated in the Local Plan	Total derived from A-E above	18,984	25,179	No comment required.
G	5% flexibility rate on site allocations	Ensuring flexibility, choice and competition in the market for land.	+949	+2,518	We propose a flexibility rate of at least 10%.
H	Total amount of land to be allocated in the Local Plan	Total taking account of factors A-G above	19,933	27,697	
				+500	Amended delivery on strategic sites.
			19,933	28,197	Additional 8,264 dwelling is needed to be added to the supply.

6.15 As is evident from the above assessment based on our assumptions, the original figure identified within Table 3 of the amount of land to be allocated in the Local Plan would increase to 28,197 dwellings a difference of an extra 8,262 dwellings that were required to be found as part of the Local Plan process.

SECTION 7: HOUSING DISTRIBUTION

7.1 This section comments on the spatial development strategy set out in Section 4.1 of the Draft Local Plan. The approach is based on the principle of distributing the number of homes based on the four sub areas of:

- Huddersfield;
- Dewsbury and Mirfield;
- Batley & Spen;
- Kirklees Rural.

7.2 From the assessment, it is unclear how the proportion of the number of houses has been divided between the four district sub areas although we appreciate there is a range of factors that could influence this process such as the size, character and role and function of the district settlements. Nevertheless, we would have expected a more transparent approach having regard to both 'top down' (i.e. settlement hierarchy) and 'bottom up' (i.e. environmental and technical consideration and market forces) factors to ensure sufficient housing land accommodates need in the right places.

7.3 From Table 5 of the Local Plan, it is clear that a reasonable proportion of housing is spread across the four sub areas with Huddersfield being the highest accommodating 35% proportion of the overall amount of the land to be allocated in the Local Plan and the lowest being Dewsbury and Mirfield at 16%.

7.4 The Roberttown site is situated within Batley & Spen and the proportion of the growth envisaged would be 23%. Given the town, district and local centres within the Batley and Spen area offer a good range of local shops and facilities together with good local employment opportunities as well as being a strong housing market, it is our view that the proportion of growth directed to Batley & Spen should increase as this would align more closely with overall vision identified in Section 3.2 of the Draft Local Plan. In particular, it is well placed to encourage inward investment and stimulate economic growth as it has good motorway links to the M62 and the draft Local Plan seeks to promote a prime strategic employment opportunity at Cooper Bridge on the edge of the Batley & Spen Sub area. .

- 7.5 The proportion of the growth to Batley & Spen should certainly be greater than the Kirklees Rural Sub Area (26%) which has relatively poor motorway access and limited accessibility to employment opportunities and important local services and facilities. Whilst we would not deny the Kirklees Rural Area should experience a certain level of growth there is an imbalance between the apportionments of housing directed to this area compared to settlements identified in the more sustainable sub areas which would include the Batley & Spen area.
- 7.6 Having regard to the Alternative Spatial Option (4.1.1) this considers allocating development based on the size of settlements. We do not consider this to be an alternative but rather a key principle to form the overriding development strategy. The profile of a settlement is a key element in understanding and assessing the sustainability of the development strategy. Therefore, allocating development should be seen both in terms of an overview of the four spatial sub areas together with categorising and ranking towns and villages so that future development would be distributed proportionally to their existing size and level of facilities.
- 7.7 It is considered that the Technical Paper entitled Settlement Appraisal (November 2015) provides a key piece of evidence to examine the distribution of future housing development. Interestingly, this document is not referred to in the supporting evidence to Section 4.1 of the draft Local Plan. For each identified settlement, it provides a methodology for assessing their accessibility to key services and facilities. Within the Batley & Spen sub area, Roberttown is identified as a defined settlement (although appears to have been missed off Table 4 in the Settlement Appraisal document). From the Settlement Appraisal matrix in Appendix 6 of this Technical Paper. Roberttown Settlement has an accessibility score of 20 which when compared to other settlements (not only within the same sub region but elsewhere) is a credible and robust score. We would recommend that the evidence within the Settlement Appraisal Technical Paper should form a key element in the Council's assessment when seeking to allocate and distribute development. This would meet the Strategic Objective Number 4 which seeks to *'provide new homes which meet the needs of the community offering a range of size, tenure and affordability with good access to employment, public transport, shops and services'*.
- 7.8 The spatial development strategy also adopts the principle of protecting important openspaces within urban areas and we would support the principle of this objective as it is important that these amenity areas continue to serve an identified local need.

7.9 Paragraph 4.5 of the draft Local Plan seems to suggest a brownfield first policy with the provision of a sequential approach on the basis of brownfield sites followed by greenfield sites within settlements, then urban extensions and then detached Green Belt sites. We object to the principle of this sequential approach as this does not comply with any of the principles outlined within the Framework. At Paragraph 17 of the Framework, a key principle only encourages the effective use of land by re-using previously developed land but it does not advocate a brownfield first policy. Adopting a sequential approach to releasing land will essentially stifle the ability to deliver the growth aspirations outlined within the Local Plan and recognised within the Leeds City Region Plan. In Section 6 of our representations, we have already highlighted in the housing trajectory that growth will remain below the required housing completion rate in the short term. To achieve the economic growth ambitions of the City Region, a step change is required in the delivery of housing and the message of a brownfield first sequential approach would only exacerbate this problem. The alternative approach is to identify a range and choice of deliverable and sustainable housing opportunities that would be balanced between brownfield and greenfield sites in order to positively accommodate the housing needs of the district.

SECTION 8: REPRESENTATIONS TO OTHER RELEVANT POLICIES

8.1 The previous sections have focused on the key principles in relation to delivering housing growth within the district specifically analysing the projected future housing need as well as the overriding spatial strategy. Within this context, Section 8 comments specifically on the relevant policies in relation to promoting the site at Roberttown without seeking to repeat the points made above.

Policy ELP1 – Presumption in Favour of Sustainable Development

8.2 This policy reconfirms the guidance found within the Framework and the positive tone of this Policy is supported, particularly the objective of seeking to work proactively with applicants and secure development that improves the economic, social and environmental conditions of the area.

Policy DLP2 – Location and New Development

8.3 This Policy seeks to deliver planned growth favouring the larger settlements but we consider the Settlement Appraisal and the range and types of facilities should also be a key factor in deciding where new development is focused. Whilst we would not encourage a prescriptive percentage distribution of the housing need between specific settlements, we equally think that the proposed general distribution between the four sub areas is too vague and imprecise. To ensure a suitable framework is created to direct new development we consider there should also be an indication within the draft Local Plan identifying those settlements that are of a size, function and character that can achieve the delivery of housing and employment growth in a sustainable manner. As part of this process, we would promote the settlement of Roberttown as a place which could accommodate further development opportunities.

Policy DLP3 – Providing Infrastructure

8.4 This policy confirms that the Council will work with partners to bring forward the necessary and proportionate essential infrastructure that is required. As Paragraph 4.22 confirms, the NPPF states that the Local Plan should not include such a scale of obligations and policy burdens that the viability of development is threatened. It is therefore, important to ensure that contributions and potential CIL rates on development viability is sensible and realistic. Provided that the Policy only requires improvements to infrastructure capacity to cater for the additional needs the

development generates then we do not object to the approach advocated by the Council.

Policy DLP4 – Masterplanning Sites

- 8.5 It is assumed that this Policy will relate to sites over a certain threshold but it is unclear from the current wording.
- 8.6 The masterplan criteria is very extensive and we are of the opinion that the work we have already undertaken in terms of promoting the Roberttown site already fulfils many of the expectations of this Policy.

Policy DLP5 – Safeguarded Land (land to be Safeguarded for Potential Future Development)

- 8.7 The NPPF at Paragraph 85 identifies that where necessary Local Plans should provide safeguarded land to meet longer term development needs ‘well beyond the Plan Period’ and that Local Authorities should satisfy themselves that Green Belt boundaries ‘will not need to be altered’ at the end of the Plan Period. There is an assumption that where it is justified to amend Green Belt boundaries as part of the Local Plan process, the new Green Belt boundary should not require altering at the end of the Plan Period.
- 8.8 Whilst we support the principle of safeguarded land, the Policy wording and justification does not fully address the issue. Further work is required to provide justification as to the amount of safeguarded land that should be reserved to accommodate potential future housing and employment requirements beyond the Plan Period. It is accepted that change to the safeguarded land allocations would only occur through a review of this Local Plan. Nevertheless, it is recommended that a clear rationale for identifying safeguarded land and an appropriate time arising beyond the Plan Period is required. This would afford longevity to the Green Belt and satisfy Paragraph 83 of the Framework which confirms that once established Green Belt boundaries should be ‘.....capable of enduring beyond the Plan Period’.

Alternative Option DLP5 – 4.6.2 – Safeguarded Land

- 8.9 This alternative would allow some safeguarded land to be brought forward within the Plan Period as a contingency if allocated sites do not deliver sufficient development. This option has been dismissed by the Council but we consider it is a sensible approach to adopt particularly as the plan should be sufficiently flexible to meet changing and unforeseen circumstances. It is accepted that the identification of site

allocations through the Local Plan process should ensure both suitable and deliverable sites that will come forward during the Plan Period but based on the historic under-delivery rates and the requirements to boost housing supply having contingency measures in place would be a sensible approach to adopt. With the introduction of regular monitoring and key indicators to determine whether or not the plan is delivering against the requirement would ensure that measures are put in place to identify whether a Local Plan Review is required and could therefore lead to the release of contingency sites. Such measures could be the failure of the Council to maintain a five year supply of deliverable housing sites.

Policy DLP7 – Place Shaping

- 8.10 For each of the four sub areas in the Local Plan, this Policy seeks to encourage development proposals to build on their strengths, opportunities and help address challenges.
- 8.11 Section 5.3 is entitled Batley & Spen and it recognises that although the built up areas of Heckmondwike, Batley & Dewsbury have merged into one urban area, many settlements are separated by only relatively narrow areas of Green Belt. These narrow areas of Green Belt are identified on Figure 5 and it is interesting to note that in so far as our Roberttown site is concerned, there is no recognition that a narrow Green Belt boundary exists between the settlement of Roberttown and Heckmondwike. From the Council's assessment we would conclude that there is a clear assumption that the settlement of Roberttown has already merged with the urban area of Heckmondwike and so its sensitivity is less than other areas that have been recognised as having narrow Green Belt gaps between settlements.

Policy DLP11 – Housing Mix and Affordable Housing

- 8.12 The Policy identifies that the proportion of affordable housing should be at least 20% of the total unit on market housing sites for schemes of more than 10 dwellings. By suggesting the policy is a minimum requirement, it does not provide clarity or certainty as to the amount that would be acceptable.
- 8.13 It is important that the Council set a clear threshold and target which has a sound evidence base in terms of justifying the overall viability of the Local Plan. Evidence would suggest from the Council's CIL Study that a large proportion of the district would generate values that would be unviable if a 20% affordable housing requirement was imposed. We would therefore request that the 20% affordable housing figure is re-examined and a lower percentage figure should be identified.

8.14 In response to the Starter Home initiative that is now being promoted by the Government, the Policy should be amended to consider the implication of these emerging changes.

SECTION 9: CONCLUSIONS

- 9.1 This is a formal response to the Kirklees Local Plan – Strategy and Policies submitted on behalf of Strata Homes (Yorkshire) Limited specifically in relation to the promotion of a site known as ‘Land to the South of Richmond Park Avenue, Roberttown’ with Reference Number H442 in the Local Plan evidence base work.
- 9.2 We consider that the site should be allocated for housing purposes and these representations have focused on those aspects of the policies and proposals that seek to justify housing requirement.
- 9.3 We consider that the Local Plan does not meet the Government’s key test of soundness set out in the framework having regard to the key tests identified in Paragraph 182.
- 9.4 In our representations we have demonstrated that Strata Homes are fully committed to promoting and delivering the Roberttown site. The comprehensive assessment work we have undertaken to date provides strong evidence to demonstrate the suitability and deliverability of the site coming forward in the short term to support the required level of growth for the district.
- 9.5 The masterplan process we have already undertaken and submitted to your Authority in October 2014 entitled ‘Development Framework Report’ has demonstrated that the site performs well in sustainability terms and there are no major constraints associated with facilitating the scale and mix of approximately 240 dwellings. Using our evidence base work and applying this to the Council’s Sustainability Appraisal (in particular the SA objectives) we have challenged some of the scores/grading which lead to a stronger sustainability performance than currently reflected within the SA.
- 9.6 By commissioning landscape consultants, Smeeden Foreman to review the Local Authority’s Green Belt evidence base work and apply this to the Roberttown Site, we have demonstrated that the site makes a very limited contribution to the Green Belt in terms of preventing settlements from merging, checking unrestricted urban sprawl and safeguarding the Countryside from encroachment as the site is considered disconnected from the surrounding areas of countryside. The Smeeden Foreman Green Belt Analysis Plan provides a proposed revised Green Belt boundary that would not only allow the release of the Roberttown Site for housing but also provide a strong physical feature. It is considered that the rear curtilages of the existing properties

along Roberttown Lane are both recognisable and permanent as the new Green Belt boundary.

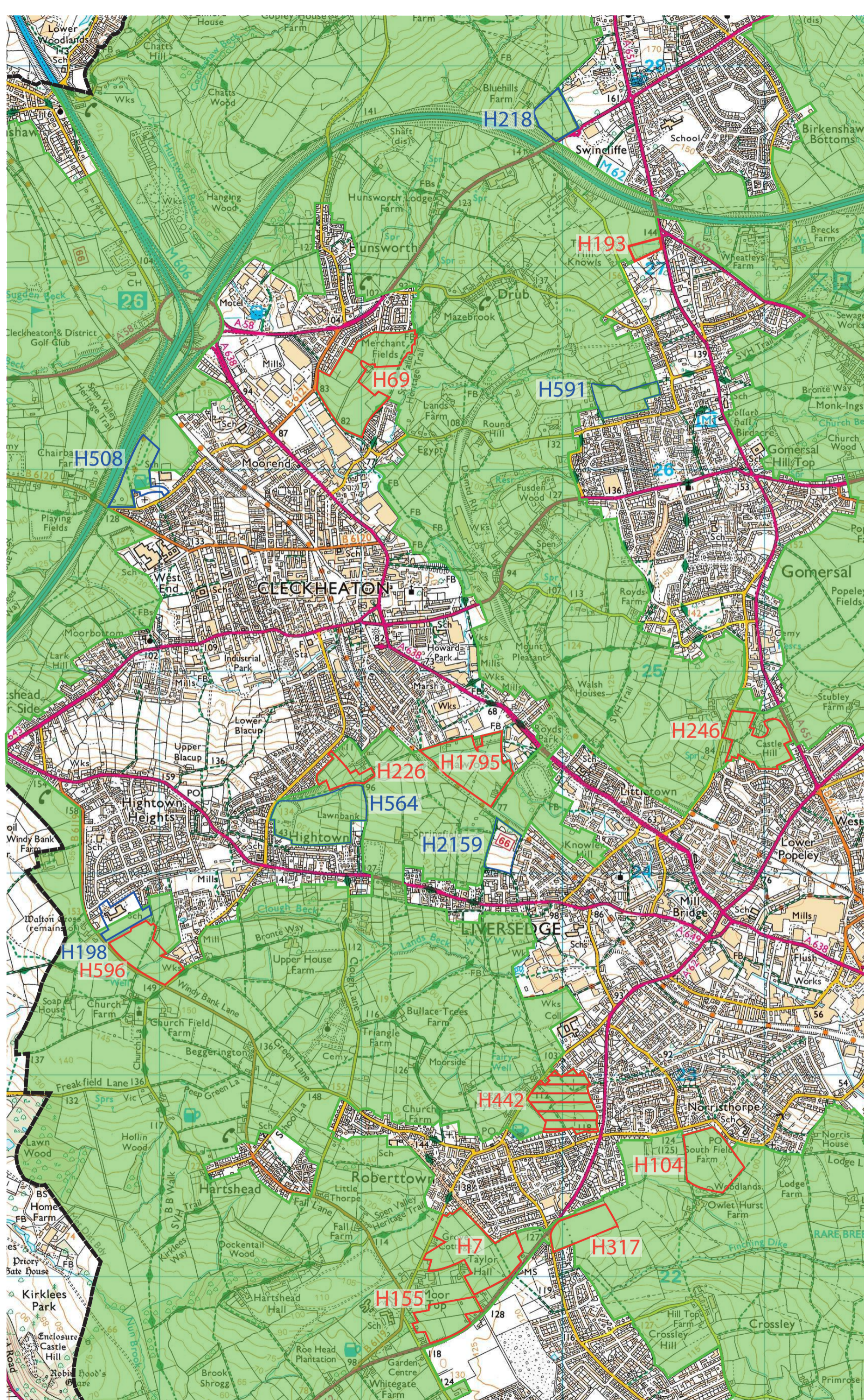
- 9.7 We have undertaken a comparative analysis of other sites of similar scale and nature to the Roberttown Lane site within the local area that are currently designated as Green Belt. These have been assessed in terms of their sustainability credentials; their likelihood of deliverability and impact on the Green Belt. Tables 1-3 in Appendix 1 clearly articulate and summarise the assessment work and based on our judgement, the Roberttown Site has strong credentials when compared to the other opportunities being assessed.
- 9.8 Based on our assessment of housing need over the period 2013 to 2031, we have studied the Council's evidence base but we are of the view that the 'objectively assessed' housing need figure of 1,630 dwellings per year does not reflect the economic aspirations of the Council that are expressed either within the Local Plan or the Kirklees Economic Strategy. In addition, the housing need should be re-evaluated to more accurately reflect the migration patterns. Both migration and fulfilling the Council's economic aspirations will lead to an increase in the housing need figure. We have calculated that the minimum dwelling requirement should be at least 1,800 dwellings per year over the Plan Period.
- 9.9 From our assessment of the different forms of housing supply, we consider the Council have overestimated the anticipated delivery from sites with existing planning permission, the windfall allowance and the likely timescales for the release of the three strategic housing allocations. Furthermore, to create a wide choice and range of housing sites that are available, we consider that the 'flexibility rate' is increased from a buffer of 5% to at least 10%. This would reflect the persistent record of un-delivery of housing within Kirklees as well as the ability of the district to boost the delivery of housing as quickly as possible.
- 9.10 We have commented on the distribution of homes within the district and consider that a greater emphasis should be placed on the Batley and Spen Sub Region particularly given its locational advantages when compared to the Kirklees Rural Sub Area which is currently proposed for a greater level of growth. We therefore consider that the housing growth directed to the Batley Spen Area should be greater than the Kirklees Sub Rural Sub Area. More specifically, it is important to recognise from the Settlement Appraisal evidence that Roberttown is identified as a settlement that performs well in terms of accessibility and the provision of local services and facilities.

- 9.11 Finally, we have made specific representations to other relevant policies within the draft Local Plan that relate directly and indirectly to the promotion of the Roberttown Site for housing purposes.
- 9.12 We trust you will give careful consideration to the representations we have submitted and we would let to be kept informed of future consultation stages.

APPENDIX 1

Key

- Draft Proposed Allocated Sites
- Draft Local Plan Rejected Sites
- Green Belt Boundary
- Kirklees Borough Boundary
- Roberttown Site (H442)



Roberttown, Kirklees

Location of Comparison Sites Assessment

PROJECT NO: HG2435
 DRAWING NO: Rev1
 DATE: 20.01.2016

Table 1: Signet Review of LUC Sustainability Appraisal

Sustainability Appraisal Ref		1. Employment	2. Economy	3. Education	4. Health	5. Amenity	6. Services and Facilities	7. Crime	8. Recreation	9. Housing	10. Sustainable Transport	11. Efficient Land Use	12. Landscape	13. Historic Environment	14. Biodiversity & Geodiversity	15. Pollution	16. Flooding	17. Waste	18. Efficient use of Materials	19. Climate Change	Comments
Objection Site																					
H442 Land south of Richmond Park Avenue	LPA Score	++	0	++?	+	--	+	0	++ / --?	++	++	--	--?	?	0?	0	-	-	0	++	See our appraisal of SA's scores in Section 3 of our representations.
	Signet	++	0	++	+	0	++	+	++	++	++	-	-	0	0	0	0	0	0	0	
Proposed Allocated Sites																					
H198 Land south of Second Avenue	LPA	++	0	+	0	-	-	0	++ / --?	+	++	-	-?	?	0?	0	-	-	0	++	1. The western part of the site is less accessible so downgrade. 5. Apply a consistent approach to our assessment of H442 means this score is also upgraded.
	Signet	++/+	0	+	0	0	-	0	++ / --?	+	++	-	-	?	0?	0	-	-	0	++	
H564 Land east of Hightown Road	LPA	++ / +	0	++?	+	-	+ / 0	0	++	++	++	--	--?	0?	0?	0	-	-	0	++	5. Apply a consistent approach to our assessment of H442 means this score is also upgraded. 11. Upgrade score to reflect insufficient brownfield land to meet housing need.
	Signet	++ / +	0	++?	+	0	+ / 0	0	++ / +	++	++	-	--	0?	0?	0	-	-	0	++	
H508 Land west of Whitechapel Road	LPA	++	0	++?	+ / 0	--	+ / 0	0	++ / --?	+	++	-	-?	?	-?	0	-	-	0	++	1. Whilst a significant positive effect on southern portion, there is a minor positive effect for the north east area of the site. 11. This is a large site but recognise that there is insufficient brownfield sites to meet housing need, therefore, no change to score.
	Signet	++ / +	0	++?	+ / 0	--	+ / 0	0	++ / --?	+	++	-	-	?	-?	0	-	-	0	++	

Table 1: Signet Review of LUC Sustainability Appraisal

Sustainability Appraisal Ref		1. Employment	2. Economy	3. Education	4. Health	5. Amenity	6. Services and Facilities	7. Crime	8. Recreation	9. Housing	10. Sustainable Transport	11. Efficient Land Use	12. Landscape	13. Historic Environment	14. Biodiversity & Geodiversity	15. Pollution	16. Flooding	17. Waste	18. Efficient use of Materials	19. Climate Change	Comments
H218 Bluehills Farm, Whitehall Road	LPA	+ / 0	0	+?	+ / 0	--	0 / -	0	++ / --?	+	+	-	-?	?	0?	0	-	-	0	+	11. This is a large site but recognise that there is insufficient brownfield sites to meet housing need, therefore, no change to score.
	Signet	+ / 0	0	+?	+ / 0	--	0 / -	0	++ / --?	+	+	-	-	?	0?	0	-	-	0	+	
H591 Land west of Cliffe Mount	LPA	++	0	++?	0 / +	-	+ / -	0	++ / --?	+	++	-	-?	?	-?	0	-	-	0	++	1. Site is less accessible to employment opportunities compared to H442 therefore downgrade to minor positive. 3. Site is less accessible to education facilities compared to H442 therefore downgrade to minor positive. 5. Apply a consistent approach to our assessment of H442 means this score is also upgraded.
	Signet	+	0	+	0 / +	0	+ / -	0	++ / --?	+	++	-	-	?	-?	0	-	-	0	++	

Table 1: Signet Review of LUC Sustainability Appraisal

Sustainability Appraisal Ref		1. Employment	2. Economy	3. Education	4. Health	5. Amenity	6. Services and Facilities	7. Crime	8. Recreation	9. Housing	10. Sustainable Transport	11. Efficient Land Use	12. Landscape	13. Historic Environment	14. Biodiversity & Geodiversity	15. Pollution	16. Flooding	17. Waste	18. Efficient use of Materials	19. Climate Change	Comments
H7 Taylor Hall Farm, Little Taylor Hall Lane	LPA	++ / +	0	+++ / +?	0	--	+/-	0	++ / -- ?	++	++	--	-- ?	0?	-?	0	-	-	0	++	1. Employment travel times vary with mixed effect but further distances than H4423 therefore downgrade.
	Signet	+ ?	0	0	0	--	-	0	-- ?	++	++	-	--	0?	-?	0	-	-	0	++	11. Upgrade score to reflect insufficient brownfield land to meet housing need.
H155 Land east of Far Common Road	LPA	++ / +	0	+++ / 0	0 / -	--	0 / --	0	++	++	++	--	-- ?	-?	-?	0	-	-	0	++	1. Employment travel times vary with mixed effect but further distances than H4423 therefore downgrade. 11. Upgrade score to reflect insufficient brownfield land to meet housing need.
	Signet	+ ?	0	0?	-	--	--	0	++	++	++	--	-	-?	-?	0	-	-	0	++	3. As eastern part of the site is 21-25 minutes from Primary School downgrade part of site from negligible to minor negative. 4. As eastern part is inaccessible to health facilities downgrade part of site to minor negative. 6. As eastern part in inaccessible to Local Centre, whole site should be downgraded. 12. SM assessment concludes Landscape as low therefore upgrade score.

Table 1: Signet Review of LUC Sustainability Appraisal

Sustainability Appraisal Ref		1. Employment	2. Economy	3. Education	4. Health	5. Amenity	6. Services and Facilities	7. Crime	8. Recreation	9. Housing	10. Sustainable Transport	11. Efficient Land Use	12. Landscape	13. Historic Environment	14. Biodiversity & Geodiversity	15. Pollution	16. Flooding	17. Waste	18. Efficient use of Materials	19. Climate Change	Comments
H317 Land between Rydal Grove & Moor View	LPA	++ / +	0	++?	+ / 0	--	0 / -	0	++	+	++	-	-?	0?	-?	0	-	-	0	++	11. Upgrade score to reflect insufficient brownfield land to meet housing need. 3. Reduce education score from significant positive to minor positive as further distances compared to H442. 6. The south eastern corner of the site is inaccessible to local centres therefore whole site should score a minor negative effect.
	Signet	++ / +	0	++?	+ / 0	-	0 / -	0	++	+	++	-	-	0?	-?	0	-	-	0	++	11. This is a large site but recognise that there is insufficient brownfield sites to meet housing need, therefore, no change to score.
H104 Land south of Norrithrope Lane	LPA	++	0	+?	0	-	+	0	++	++	++	--	--?	0?	0?	0	-	-	0	++	5 & 11. Upgrade score to be consistent with Signet score for H442.
	Signet	++	0	+?	+	0	+	0	++	++	++	-	-	0?	0?	0	-	-	0	++	12. SM assessment concludes landscape as moderate therefore upgrade score.
H596 Land off, Windy Bank Lane	LPA	++	0	+?	+ / 0	--	0 / -	0	++ / --	++	+	--	--?	?	0?	0	-	-	0	+	1. Only part of the site within high accessibility to employment therefore downgrade to minor positive effect.
	Signet	+	0	+	+ / 0	--	0 / -	0	++ / --	++	+	-	--	?	0?	0	-	-	0	+	11. Upgrade score to reflect insufficient brownfield land to meet housing need.

Table 1: Signet Review of LUC Sustainability Appraisal

Sustainability Appraisal Ref		1. Employment	2. Economy	3. Education	4. Health	5. Amenity	6. Services and Facilities	7. Crime	8. Recreation	9. Housing	10. Sustainable Transport	11. Efficient Land Use	12. Landscape	13. Historic Environment	14. Biodiversity & Geodiversity	15. Pollution	16. Flooding	17. Waste	18. Efficient use of Materials	19. Climate Change	Comments
H226 Land south of Hightown Road	LPA	+	0	++?	+	-	+/-	0	++/ --?	+	++	-	-?	0?	0?	0	-	-	0	++	3. Only a small section of the site within 6-10 minutes travel time therefore downgrade to minor positive effect.
	Signet	+	0	+	+	0	+/-	0	++/ --?	+	++	-	-	0?	0?	0	-	-	0	++	11. This is a large site but recognise that there is insufficient brownfield sites to meet housing need, therefore, no change to score.
H1795 Primrose Hill Farm, Primrose	LPA	++/ --	0	++?/ --?	++/ --	--	+/ ++	0	++/ --?	++	--	--	-?	0?	0?	0	-	-	0	--	General Remark: Significant amount of uncertainty and variation of scores associated with this site.
	Signet	++/ --	0	++?/ --?	++/ --	--	+/ ++	0	++/ --?	++	--	--	-	0?	0?	0	-	-	0	--	
H246 Land between, Castle Hill Road and Firthcliffe Parade	LPA	+	0	+?	+	--	-/--	0	++/ --?	++	+	--	--?	-?	0?	0	-	-	0	+	11. Upgrade score to reflect insufficient brownfield land to meet housing need.
	Signet	+	0	+?	+	--	-/--	0	++/ --?	++	+	-	--	-?	0?	0	-	-	0	+	
H69 Merchant Fields, Hunsworth Lane	LPA	++	0	++?/ --?	+/--	--	+/--	0	++/ --?	++	+	--	--?	0?	-?	0	-	-	0	+	1. As half the site is less accessible downgrade score to positive and minor positive effects.
	Signet	++/ +	0	++?/ --?	+/--	--	+/--	0	++/ --?	++	+	-	-	0?	-?	0	-	-	0	+	11. Upgrade score to reflect insufficient brownfield land to meet housing need. 12. SM assessment concludes landscape as moderate therefore upgrade score. General Remark: Significant amount of uncertainty and variation of scores associated with this site.

Table 1: Signet Review of LUC Sustainability Appraisal

Sustainability Appraisal Ref		1. Employment	2. Economy	3. Education	4. Health	5. Amenity	6. Services and Facilities	7. Crime	8. Recreation	9. Housing	10. Sustainable Transport	11. Efficient Land Use	12. Landscape	13. Historic Environment	14. Biodiversity & Geodiversity	15. Pollution	16. Flooding	17. Waste	18. Efficient use of Materials	19. Climate Change	Comments
H193 Land north of Holme House	LPA	++	0	++? / +?	+ / 0	--	+ / -	0	++	+	++	-	-?	0?	-?	0	-	-	0	++	11. This is a large site but recognise that there is insufficient brownfield sites to meet housing need, therefore, no change to score.
	Signet	++	0	+?	+ / 0	--	+ / -	0	++	+	++	-	-	0?	-?	0	-	-	0	++	

Key	
++	The option is likely to have a significant positive impact on the SA objective(s).
+	The option is likely to have a positive impact on the SA objective(s).
0	The option is likely to have negligible or no impact on the SA objective(s).
-	The option is likely to have a negative impact on the SA objective(s).
--	The option is likely to have a significant negative impact on the SA objective(s).
?	It is uncertain what effect of the option will have on the SA objective(s), due to a lack of data.
+/-	The option is likely to have a mixture of positive and negative impacts on the SA objective(s).

Table 2: Kirklees SHLAA Site Assessment

Local Plan Ref	SHLAA Ref	Address	Settlement	Main Allocation	Land Type	Flood Risk	Area (ha)	Density	Capacity	Phasing	Suitable	Available	Achievable	Comments
----------------	-----------	---------	------------	-----------------	-----------	------------	-----------	---------	----------	---------	----------	-----------	------------	----------

Objection Site

H442	812	Land to the south of Richmond Park Avenue	Roberttown	Green Belt	Greenfield	Zone 1	7.9	30	237	0 - 5 years 6 - 10 years	Potential contamination in the north of the site and overhead powerlines cross the site.	Owners support development	Costs should be offset for a site of this size	See our response to this assessment at Section 3 of our representations.
------	-----	---	------------	------------	------------	--------	-----	----	-----	-----------------------------	--	----------------------------	--	--

Proposed Allocated Sites

H198	832	Land to the south of Second Avenue	Hightown	Urban Green space	Brownfield Greenfield	Zone 1	3.3	30	101	6 - 10 years	No significant constraints	The majority of the site is owned by the Council. The owner of the remainder supports development	Costs should be offset for a site of this size.	
H564	10	Land east of Hightown Road	Hightown	Green Belt	Greenfield	Zone 1	9.8	30	294	0 - 5 years 6 - 10 years	No significant constraints	Owners support development	Costs should be offset by the market for a site of this size	
H508	319	Land to north west, west and south west of Whitechapel Middle School Whitechapel Road	Cleckheaton	Green Belt	Greenfield	Zone 1	3.7	30	111	0 - 5 years 6 - 10 years	Open site with possible access. Noise and air quality issues may exist due to proximity to the motorway.	No ownership constraints	Costs due to noise and air quality measures may not be significant relative to market area.	
H218	364	Land to the east of Bluehills Farm Whitehall Road West	Birkenshaw	Green Belt	Greenfield	Zone 1	0.7	30	99	6 - 10 years	Problems of noise from motorway, electric lines, and of high-level contamination on part of site.	Owner supports development, however SFC submitted prior to 2008	Medium local market strength within high broad market area, some costs associated with decontamination and re-routing of electricity lines.	

Table 2: Kirklees SHLAA Site Assessment

H591	7	Taylor Hall Farm Little Taylor Hall Lane	Hartshead	Green Belt	Greenfield	Zone 1	11.4	30	342	6 - 10 years 11 - 15 years	No obvious constraints	Owner's intentions unknown	No adverse costs
Local Plan Ref	SHLAA Ref	Address	Settlement	Main Allocation	Land Type	Flood Risk	Area (ha)	Density	Capacity	Phasing	Suitable	Available	Achievable

Rejected Sites

H7	23	Land to the north of 271 Cliffe Lane	Gomersal	Green Belt	Greenfield	Zone 1	3.52	30	105	0 - 5 years	Topographical constraint	Owners support development	Costs should be offset by the market for a site of this size
H155	727	Land east of Far Common Road	Hartshead	Green Belt	Greenfield	Zone 1	5.1	30	153	0 - 5 years 6 - 10 years	No obvious constraints	Owners support development	No adverse costs
H246	953	Land at Castle Hill Road	Gomersal	Green Belt	Greenfield	Zone 1	6.3	30	190	0 - 5 years 6 - 10 years	Topographical constraint	Owners support development	Costs should be offset by market condition
H69	188	Merchant Fields East of Hunsworth Lane	Hunsworth	Green Belt	Greenfield	Zone 1	11.9	30	359	0 - 5 years 6 - 10 years	Greenfield site with an area of TPO along access track adjacent to farm, site access is achievable	No ownership constraints	Average market area and low site preparation costs.
H193	825	Land north of Holme House Oxford Road	Gomersal	Green Belt	Greenfield	Zone 1	0.8	30	24	0 - 5 years	Few constraints on the site, but access from Oxford Road goes through land with protected trees on it.	No ownership constraints.	Access may be an issue, though site is located in strong market area

Table 3: Summary Comparison

Local Plan Ref	Site Address	Area (ha)	Indicative Capacity	Green Belt Ref	SHLAA Ref	Signet SA Score Summary							SHLAA Delivery	Summary Considered for release from Green Belt? (SM Assessment)
						++	+	0	-	--	?	+/-		

Objection Site

H442	Land to the south of Richmond Park Avenue, Roberttown	7.8	237	RT6	821	7	2	8	2	0	0	0	0-5	Yes
------	---	-----	-----	-----	-----	---	---	---	---	---	---	---	-----	-----

Proposed Allocated Sites

H198	Land to the south of, Second Avenue, Hightown, Liversedge	3.5	101	HT7	832	2.5	2.5	7	5	0	1	1	6-10	Yes
H564 (H1796)	Land east of Hightown Road	10.7	321	HT1, CK1	10	5	2.5	7.5	3	1	0	0	0-5 6-10	No
H508	Land to the west of Whitechapel Middle School, Whitechapel Road, Cleckheaton	4.4	111	CK18	319	3	2.5	4.5	5	1	1	1	0-5 6-10	Yes
H218	Bluehills Farm, Whitehall Road, West Birkenshaw	3.3	99	B/EB13	364	0	5	6.5	4.5	1	1	1	6-10	Needs further study
H591 (H446, H552)	Land to the west of Cliffe Mount, Ferrand Lane, Gomersal	3.9	105	GS13	7	2	3.5	5.5	5	0	1	2	0-5	Yes

Rejected Sites

H7	Taylor Hall Farm, Little Taylor Hall Lane, Roberttown	10.9	342	RT4, RT5	23	3	0.5	7.5	4	2	0	2	6-10 11-15	No
H155	Land east of Far Common Road	5.1	153	MF16, MF17	727	4	0.5	4.5	7	2	0	1	0-5	No
H317	Land between, Rydal Grove and Moor View, Mirfield	3.9	118	HK3	-	3.5	2	5.5	6	1	0		Not known	No
H104	Land to the south of, Norristhorpe Lane, Norristhorpe	6.6	199	HK5	-	5	3	7	4	0	0	0	Not known	No
H596	Land off, Windy Bank Lane, Hightown	5.2	157	HT7	-	1	4.5	6	3.5	2	1	1	Not known	No
H226	Land south of, Hightown Road, Liversedge	2.2	62	CK3	-	2	4	7	4	0	0	2	Not known	No

Table 3: Summary Comparison

Local Plan Ref	Site Address	Area (ha)	Indicative Capacity	Green Belt Ref	SHLAA Ref	Signet SA Score Summary							SHLAA Delivery	Summary Considered for release from Green Belt? (SM Assessment)
						++	+	0	-	--	?	+/-		
H1795	Primrose Hill Farm, Primrose Lane, Cleckheaton	9.2	193	CK4	-	1.5	0.5	6	3	4	0	4	Not known	Needs further study
H246	Land between, Castle Hill Road and Firthcliffe Parade, Gomersal	6.3	190	GS1, LV13, LV14	953	1	5	5	3.5	2.5	0	1	Not known	No
H69	Merchant Fields, Hunsworth Lane, Cleckheaton	12.1	539	CK10	188	1.5	2.5	5	4	1	0	4	0-5 6-10	Needs further study
H193	Land north of Holme House, Oxford Road	0.8	18	GS10	825	4	2.5	4.5	5	1	0	1	0-5	No



Rowe House
10 East Parade
Harrogate
HG1 5LT

www.signetplanning.com