

CALDERDALE LOCAL PLAN

SITE ALLOCATIONS ASSESSMENT METHODOLOGY STATEMENT

Calderdale Metropolitan Borough Council

2018



Contents

1. Introduction	2
2. Background.....	2
3. Planning Policy.....	4
4. Consultation	5
5. Methodology	8

Appendix 1 – Rejected Sites (Sieve)

Appendix 2 – Site Survey Form

Appendix 3 – Unstable Land

Appendix 4 – Special Landscape Area

Appendix 5 – Highway Assessment Methodology

Appendix 6 – Mineral Safeguarding Areas

Appendix 7 – Agricultural Land Classification

Appendix 8 – Accessibility Assessment

Appendix 9 – Indicative Developable Area Example

Appendix 10 – Availability Letter

Appendix 11 – Green Belt Assessment of Sites

Appendix 12 – Filtered Sites (Rejected)

Appendix 13 – Allocated Sites

Appendix 14 – Example Site Assessment Report

1. Introduction

- 1.1 The Local Planning Authority of Calderdale is preparing a development plan for the Borough in order to set the planning policies for the area which planning applications will be determined upon. The Local Plan is the new development plan for Calderdale Metropolitan Borough Council (the Council) which will supersede the Replacement Calderdale Unitary Development Plan (RCUDP) 2006 as amended by direction of the Secretary of State 2009. The Local Plan is a key document in delivering sustainable development that reflects the vision and aspirations of local communities.

2. Background

- 2.1 The Council was in the process of producing a development plan which consisted of a Core Strategy and Land Allocations and Designations Plan document. However, due to a delay in the delivery of evidence required to ensure that the Core Strategy was “sound”, and evidence of other plan failures across the country, the Council after taking advice from the Planning Advisory Service (PAS) and guidance contained within the National Planning Policy Framework (NPPF), resolved to produce a single Local Plan containing both strategic policies and site allocations.
- 2.2 Allocating sites is integral to the Local Plan as it is these which will facilitate the delivery of the Local Plan's strategic policies and objectives. The Council is seeking to identify an appropriate portfolio of sites to allocate for housing, employment, retail, and other uses. These sites are required to accommodate an ever expanding population, to create new places and spaces, reflecting the needs and priorities of their communities and to ensure that the mutually dependent economic, social and environmental pillars of sustainability are met:
- Economic: contributing to building a strong, responsive and competitive economy, by ensuring sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure.
 - Social: supporting strong, vibrant and healthy communities by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality environment, with accessible local services which reflect the community's needs and support its health, social and cultural well-being.
 - Environmental: contributing to protecting and enhancing our natural, built and historic environment and as part of this helping to improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy.
- 2.3 The Local Plan site allocations are informed by a robust evidence base including, but not limited to, the Strategic Housing Market Assessment (SHMA) which assesses housing need and demand; the Strategic Housing Land Availability Assessment (SHLAA) which assesses the land available over a 15 year period, and an Employment

Land Study (ELS) which covers employment needs and availability. Furthermore, an Open Space Study; Minerals and Waste assessments; a Retail Study and a Green Belt Review (GBR) also informs the site allocations process. The GBR and Site Allocations Assessment are undertaken independently; however, the results of the GBR are taken into account as part of the Site Allocations Assessment.

- 2.4 In April 2015, the Site Allocations Assessment Methodology was published which was originally used to assess the sites included in the 'Potential Sites and other aspects of the Local Plan' document. Subsequently, a revised methodology was released in July 2017 which was used to assess the sites for the 'Local Plan - Initial Draft'. In the course of assessing the sites the methodology has again been refined to reflect the feedback received from a range of statutory consultees. This has been done to ensure a robust, tried and tested methodology, which will guarantee the most appropriate sites have been chosen for allocation. This document sets out the revised methodology undertaken to assess sites for allocation and accompanies the Local Plan - Publication Draft site assessments. The document contains a list of the Publication Draft allocations and those sites which have been rejected and the reasons why.

3. Planning Policy

- 3.1 The NPPF published in March 2012 was a key part of the Government's reforms to make a simple, accessible planning system in order to protect the environment and promote sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. This means, for plan making, that planning policies should positively seek opportunities to meet the development needs of the Borough.
- 3.2 The NPPF sets out the requirements for producing a Local Plan and states a fundamental part of the Local Plan is to allocate sites to promote development and the flexible use of land, bring forward new land where necessary and provide detail on form, scale, access and quantum of development where appropriate. In order to do this the Planning Practice Guidance provides clarity in the production and deliverability of local plans. It requires planning authorities to provide sufficient detail about nature, location and scale of development when proposing allocations.
- 3.3 The NPPF states that local plans should set out the opportunities for development and clear policies of what will or will not be permitted and where, whilst taking into account economic, social and environmental factors. Local Plans should also identify areas to limit change, where development is inappropriate and enhance natural, built and historic environments.
- 3.4 The NPPF also emphasises the importance of early and meaningful engagement, seeking collaboration with neighbouring authorities, local organisations, businesses and communities.
- 3.5 A considerable amount of attention needs to be placed on site viability. The NPPF requires Local Plans to be deliverable; therefore sites should not be overburdened by obligations which threaten viability. Requirements for infrastructure, affordable housing and to meet Community Infrastructure Levy should be clearly set out. The NPPF states that any affordable housing or local standard requirements that may be applied to development should be assessed at the plan making stage where possible and kept under review.

4. Consultation

4.1 There has been a range of consultations undertaken since work on the Local Plan commenced which have specifically influenced the site allocations. These include:

- Potential Sites and Other Aspects of the Local Plan;
- Local Plan Workshops;
- Local Plan Working Party; and
- Local Plan - Initial Draft.

4.2 Please see the Calderdale Local Plan Consultation Statement for further details which sets out how the Council engaged with communities and stakeholders in the preparation of the Local Plan.

Potential Sites and Other Aspects of the Local Plan

4.3 Consultation on 'Potential Sites and Other Aspects of the Local Plan'¹ which included emerging draft policies on various aspects as well as the initial suggestions for sites took place during November and December 2015 as well as additional engagement between January and March 2016. As part of this consultation, over 1500 sites were consulted on, with 365 of these being potential land allocations. These sites could accommodate growth beyond the Council's requirements for housing and employment land.

4.4 The Council received 4,433 comments on sites which were taken into consideration as part of the assessments on sites going forward to the 'Local Plan - Initial Draft'.

4.5 During the same period of consultation with the public, the sites were sent to a range of statutory and non-statutory consultees including:

Table 3.1 Internal Consultees

<ul style="list-style-type: none">• Business and Economy• Clinical Commissioning Group for Calderdale and Kirklees• Conservation (Ecology)• Conservation (Heritage)• Corporate Assets and Facility Management	<ul style="list-style-type: none">• Education Service• Environmental Health• Flooding/Drainage• Highways Development Management• Housing Services• Safer, Cleaner, Greener
---	---

Table 3.2 External Consultees

<ul style="list-style-type: none">• Canal and Rivers Trust• CE Electric UK• Civil Aviation Authority• Environment Agency• Highways England	<ul style="list-style-type: none">• The Coal Authority• West Yorkshire Ambulance Service• West Yorkshire Archaeology Advisory• West Yorkshire Combined Authority (METRO)
--	---

¹ 'Potential Sites and Other Aspects of the Local Plan' - http://calderdale.objective.co.uk/portal/planning_services/lp/lp

<ul style="list-style-type: none"> • Historic England • National Grid • Natural England • Network Rail Infrastructure Ltd • Northern Electric Distribution Ltd Service • Northern Gas Networks Ltd 	<ul style="list-style-type: none"> • West Yorkshire Ecological Service • West Yorkshire Fire and Rescue • West Yorkshire Police • Yorkshire Water plc • Yorkshire Wildlife Trust
--	---

4.6 As well as the above consultees we also took into consideration comments from other interested parties such as RSPB, Sport England, etc. who had submitted their comments through the Council's consultation portal².

4.7 It should be noted that although we have consulted with all of the above consultees not all of them have directly influenced the site assessments. A number of the consultees including services are more interested in how the future allocations would impact on the capacity of their networks and where they could identify potential infrastructure improvements. Some of the consultees decided that there were other consultees who would be making the same point so did not feel it necessary to respond.

4.8 A summary of the public responses were recorded as part of the site assessment reports within the 'Local Plan - Initial Draft' in order to acknowledge and address the public's concerns and opinions. The consultee comments were used to assess the suitability of the sites for inclusion in the 'Local Plan - Initial Draft' and where specific concerns were identified by the public such as ecological pressures, site access or distances to local services etc.; these were investigated by the Planning Team and addressed using the statutory and non statutory consultee comments.

4.9 In order to view all comments made on sites during the 'Potential Sites and Other Aspects of the Local Plan' consultation please visit: http://calderdale.objective.co.uk/portal/planning_services/sacf/sacf then click **All Comments**. You can then use **Enter keyword(s)** to search on LP site references.

Local Plan Workshops

4.10 Planning Aid England was asked by Calderdale MBC to facilitate a public consultation exercise post 'Potential Sites and Other Aspects of the Local Plan'. This took the form of six separate events in February and March 2016 across Calderdale. The events were primarily aimed at attendees looking at proposals in the general locality in which the event was located although more strategic and general topics were discussed if so desired. A description of each event, number attending and comments/questions raised by attendees can be found on the Council's website³. These comments were also used to inform the site allocations assessment.

² Calderdale Council's Consultation Portal - http://calderdale.objective.co.uk/portal/planning_services/

³ Workshop Assessment Report - <https://www.calderdale.gov.uk/environment/planning/planning-policy/local-plan/Workshops-assessment-report-PAE.pdf>

Local Plan Working Party

- 4.11 Throughout the preparation of the Local plan, a working party consisting of cross-party Ward Councillors have had regular sessions to discuss and oversee the Plan preparation. Planning Officers have presented different topic areas which the Councillors have discussed and provided guidance where necessary to Planning Officers. The Working Party also makes recommendations to Cabinet. On 2nd March 2017 the proposed draft allocations for housing and employment were presented to the Working Party. It was decided that the sites needed to be discussed in more detail, therefore two subsequent Working Parties were held on 16th March 2017 and 21st March 2017 and individual meetings were offered to ward councillors to discuss potential development/allocations in their wards. Comments from these meetings have been noted and during the consultation on the 'Local Plan - Initial Draft' these comments have been considered. Minutes of the Local Plan Working Parties can be found on the Councils Website⁴.

Local Plan - Initial Draft

- 4.12 The 'Local Plan - Initial Draft'⁵ included a vision for the sustainable future of Calderdale; full suite of draft policies; and potential new housing, employment and mixed use sites to meet the Council's need for housing and employment. There were circa 8,000 representations with circa 25,000 comments against individual aspects of sites received at consultation between 4th August to 29th September 2017. These representations were processed and compiled and sent to consultees who responded to the representations against the sites. The consultees and Planning Officer responses to the representations were used to further assess the sites in preparation for the 'Local Plan - Publication Draft'. Any new sites received during the consultation were sent to all internal and external consultees for comment and reassessed with the existing sites.
- 4.13 In order to view all comments made on sites during the 'Local Plan – Initial Draft' consultation please visit: http://calderdale.objective.co.uk/portal/planning_services/lp17/lpid then click **Read and Comment on document**. Navigate to the site/paragraph you are interested in using the left hand menu and select **View Comments** at the top of the site box. Or click **All Comments**. You can then use **Enter keyword(s)** to search on LP references.
- 4.14 The assessment of sites has been an iterative process taking into consideration the views of the public and expertise of a range of consultees. The following methodology sets out the key steps taken to assess the sites for inclusion in the Local Plan.

⁴ Council Meetings - <https://www.calderdale.gov.uk/council/councillors/councilmeetings/query.jsp>

⁵ Local Plan Initial Draft - http://calderdale.objective.co.uk/portal/planning_services/lp17/lpid

5. Methodology

- 5.1 The assessment of sites has been undertaken in six stages which reflect the stages of the Housing and Economic Land Availability Assessment guidance as set out in the Planning Policy Guidance⁶. The guidance states an assessment of land availability identifies a future supply of land that is suitable, available and achievable for housing and economic development uses over the plan period. The stages of the Site Allocation Assessment Methodology are:

Stages

1. Site Identification
 2. Suitability
 3. Development Potential
 4. Availability
 5. Achievability
 6. Sequential Approach
- 5.2 Stage 1 gathers the sites required for Stage 2 and 3 which identifies the suitability for development. Stage 4 tests whether the site is actually available for development and Stage 5 assesses the viability of the site; in other words is the site achievable? Stage 6 ensures the sites chosen are in line with a sequential approach to put forward the best sites first.

Stage 1: Site Identification

- 5.3 In order for the Council to meet the requirement of the NPPF, to provide enough sites for housing and economic growth and other uses, the purpose of this stage was to gather and identify as many sites as possible to be assessed from a wide range of sources. Stage 1 gathered sites from:

- 'Call for sites'
- Spatial Planning Evidence Base
- Review of RCUDP Allocations
- Early Consultation
- Officer Recommendations
- Sites in Calderdale Council Ownership

Call for Sites

- 5.4 The majority of sites assessed have come from the 'Call for Sites'⁷ process which has been running since 2008. This invites landowners/agents and members of the public to submit details of sites for employment, housing and other uses. During the Autumn

⁶ Planning Practice Guidance - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578755/land-availability.pdf

⁷ Call for Sites - <https://www.calderdale.gov.uk/environment/planning/planning-policy/site-submissions/index.html>

2015 consultation on potential site allocations more sites were submitted through 'Call for Sites'. It also allowed the public and community groups to inform the Council of any brownfield land not considered in the Autumn 2015 consultation.

Spatial Planning Evidence Base

- 5.5 Sites identified from evidence base such as the Strategic Housing Land Availability Assessment, Employment Land Study, Open Space Study and other evidence bases are also included for analysis.

Review of allocations in the RCUDP

- 5.6 A number of allocations in the RCUDP are still not fully developed and may still have development potential; therefore a review of existing site allocations has been undertaken. Sites which are allocated and have not yet been developed are assessed in the next stages. Allocations which were assessed included:

- New Housing Sites
- New Employment Sites
- Mixed Use Sites
- Protected Land

- 5.7 The council established:

- what land is still remaining undeveloped.
- whether the allocated sites are still available.
- whether there is any evidence of why a site has not been developed.

Early consultation

- 5.8 As part of the preparation of the Core Strategy and separate Land Allocations and Designations document in 2014, early engagement workshops⁸ in 2014 were arranged with members of local communities to consult on what site allocations and designations people think should be included in the Plan. It gave people the opportunity to suggest possible new sites and comment on potential sites which had already been put forward. These sites were also incorporated into the work being undertaken.

Officer recommendations

- 5.9 Different Council departments have specific strategic and local objectives and a thorough understanding of the Borough; therefore, Council Officers from Business and Economy, Corporate Projects, Housing, Highways, Asset Management, Development Management and a number of other departments were asked to suggest sites to be submitted for analysis. They have good local area knowledge and were able to identify potential brownfield land and strategic sites to be assessed.

⁸ Early Engagement Workshops - <https://www.calderdale.gov.uk/environment/planning/planning-policy/local-plan/land-allocations-designations.html>

5.10 Planning Officers have also conducted an online search of sites on the market through such sites as rightmove.co.uk. Sites for sale may indicate sites which are available as they are no longer required by the current owner. These were submitted by Planning Officers through the 'Call for Sites' form in order for the public to view online which sites the council have submitted.

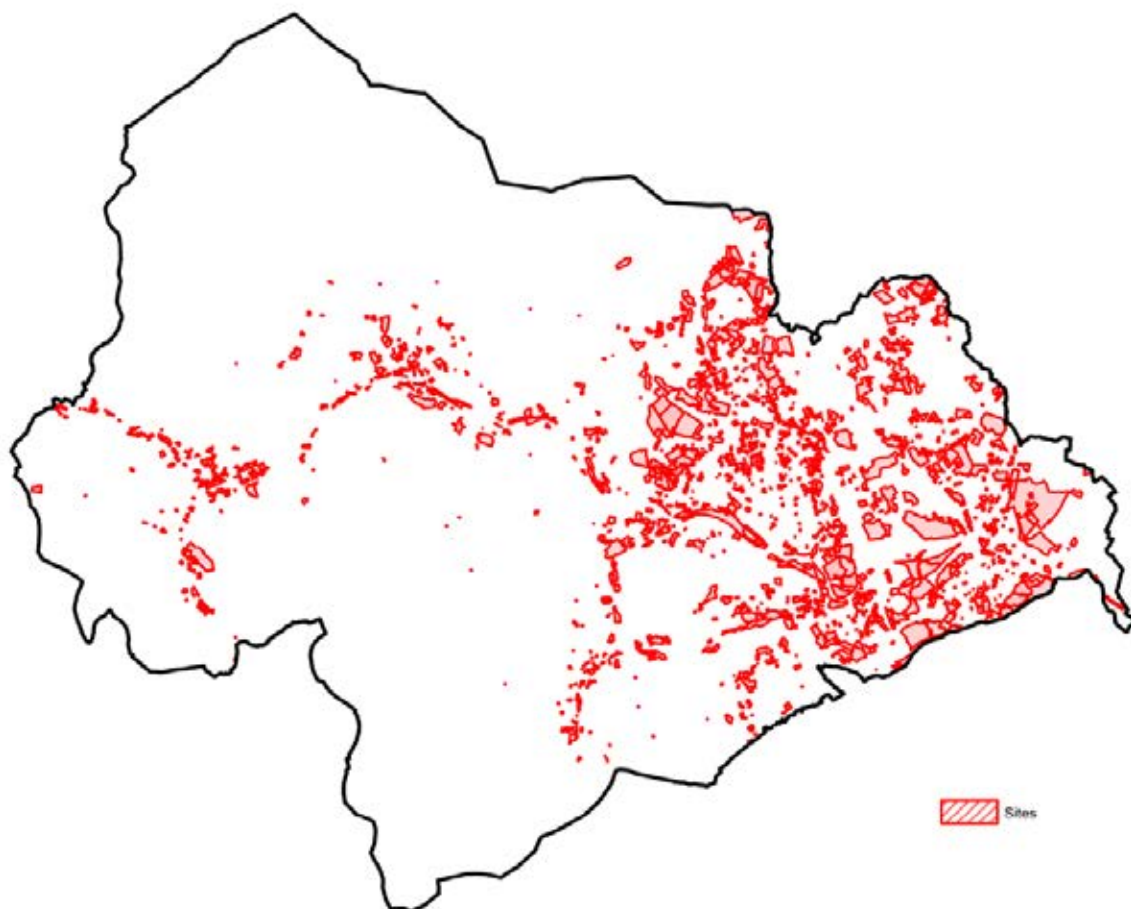
Sites in Calderdale ownership

5.11 The Calderdale ownership database was explored for potential sites and discussions were undertaken with the asset management team as to the potential of these sites. Such sites were put forward for assessment.

Site rationalisation

5.12 Once the sites from the above sources had been gathered, some rationalisation was undertaken and boundaries checked as sites may have been submitted more than once and sites may overlap with others. Sites were joined to make one large site or divided as they may have more potential as different sized sites. This initial stage provided a long list of sites which was the basis of the Calderdale Local Plan Site Allocation Assessments. This amounted to sites covering 2,472 hectares of land to be assessed.

Map 4.1 Sites assessed for allocation



- 5.13 Although a number of sites were rationalised, some were left as they were even if a site contained smaller sites within its boundary. This way it was possible to assess the impact of different sized sites. Therefore, on the online policies map where filtered sites overlay an allocation or designation, this demonstrates the site itself being rejected not necessarily the land it covers.

Stage 2: Suitability

- 5.14 The NPPF states that when assessing sites, the following factors should be considered to assess a site's suitability for development:

- physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;
- potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;
- appropriateness and likely market attractiveness for the type of development proposed;
- contribution to regeneration priority areas;
- environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

- 5.15 This stage of the methodology establishes which sites will have reasonable potential for development.

Stage 2a: Sieve

- 5.16 The aim of the 'sieve' was to rule out those sites which were deemed unsuitable for allocation as they conflict with national and local policy and/or have overwhelming environmental constraints. If the answer to any of the below factors was 'Yes' then the site was 'sieved' and did not go on to be assessed for allocation:

- Is the site under 0.25ha?
- Is the site within Flood Zone 3b?
- Has the site existing planning permission?
- Is the site within an area of importance? (SAC, SPA, Nature Reserves, Ancient Woodland, SSSI and Historic Parks and Gardens)
- Is the site located more than 500m from the Urban Area? (to reflect Green Belt Review)

- 5.17 If the answer to any of the factors was 'No' or 'Partial' then the site went forward for further assessment where mitigation or boundary amendments may have made the site suitable for allocation.

Sites under 0.25 hectares

- 5.18 Sites which were below 0.25 hectares were filtered from allocation. Many other local authorities have traditionally used a site size of 0.4 hectares, however due to the important contribution of small sites historically in Calderdale it is believed a 0.25 hectare threshold is more appropriate. Planning Practice Guidance states that a range of different sized sites will be required to deliver the required scale of development. It

suggests that sites should be assessed which could support 5 or more dwellings or economic development sites of 0.25 hectares. Sites below 0.25 ha are likely to come forward as windfalls where an assumption will be made as to their contribution to housing numbers. Sites below 0.25 hectares which could be amalgamated with another site to take it above the site size threshold has been undertaken. These smaller sites also have the opportunity to be allocated as part of Neighbourhood Plans.⁹

Located within Flood Zone 3(b)

- 5.19 Sites located within Flood Zone 3(b) are considered to be at risk which is great enough (due to the classification of functional flood plain) to merit the sites being sieved at this stage. Sites within other flood zone categories were assessed for their suitability and appropriate use of the site in the later stages of the methodology.

Map 4.2 Flood Zone 3b



⁹ Neighbourhood Development Plans - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/local-plan#neighbourhood-dev-plans>

Sites with Planning Permission

- 5.20 Sites which already have full planning permission do not need to be allocated. There is a presumption that these sites will gain planning permission again if the permissions lapse. Therefore those sites with full planning permission as of 30th September 2017 will be filtered. Those sites with Full Permission after this date will be allocated with Permission. The reason for this date is that the Extant Planning Permissions source of supply has been used to work out the Council's Housing requirement¹⁰. Sites which have outline consent or are pending will be assessed for their potential for allocation.
- 5.21 It is imperative to ensure the planning history of the site has been investigated. Any significant planning history will be considered as part of the assessment in order to identify factors that may require particular focus. For example, if a planning permission has been refused multiple times because of land stability then the site should be filtered.

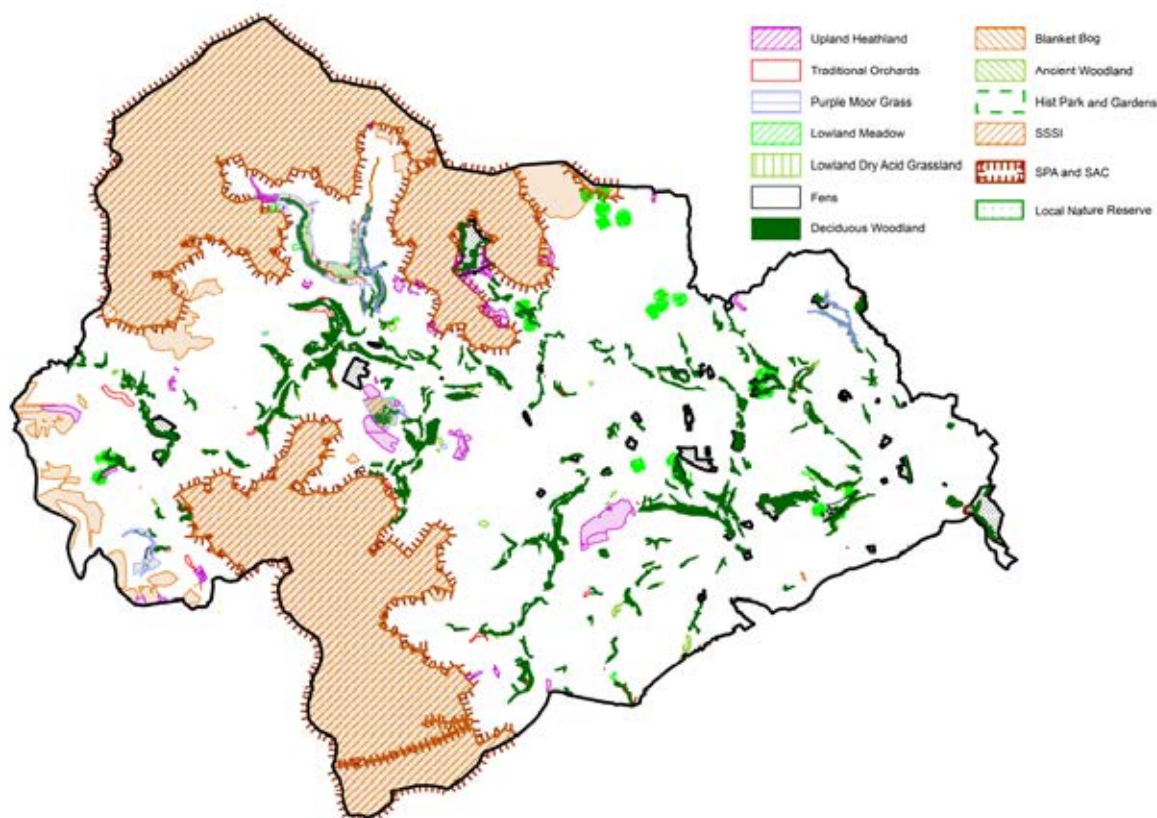
Located within areas of importance

- 5.22 Areas of local, national and international importance require protection from development. The NPPF states "allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework" (Para 17). Therefore, sites which fell within these areas have been filtered for protection, unless it was demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The protected areas are:

- Special Protection Areas
- Sites of Special Scientific Interest
- Special Areas of Conservation
- Local Nature Reserves
- Ancient Woodland
- Historic Park and Gardens
- Other Irreplaceable Habitats (Ancient Woodlands, Blanket Bog, Deciduous Woodland, Fens, Lowland Dry Acid Grassland, Lowland Meadow, Purple Moor Grass, Traditional Orchards, Upland Heath)

¹⁰Housing Technical Paper 2018 - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/homes#technical-paper>

Map 4.3 Areas of Importance



Located outside a 500 metre Urban Area buffer

5.23 Sites which fall outside 500 metres of an urban area buffer are deemed to be disconnected from the Urban Area¹¹ and would therefore fail to support the key principles of sustainable development along with potentially harming the character of the local countryside. It was considered appropriate to assess those sites which fall within the buffer which are in the Green Belt as a review of the Green Belt boundary was being undertaken. It is fair to assess those sites which could potentially be released from Green Belt as the land may perform poorly against the Green Belt purposes. Furthermore, sites which fall within some 'Village Envelopes' as allocated in the current RCUDP have been assessed to reflect the potential of these 'envelopes' being inset into the Green Belt. Those Village Envelopes which were not inset, therefore remain Green Belt and any sites within those boundaries were filtered.

¹¹ 'Urban Area' in this instance is defined as being land which is not Green Belt or Area Around Todmorden

The map shows the urban area of the City of Wakefield, which is shaded in grey. A red buffer zone surrounds the urban area, extending 500m from its boundary. The map includes numerous place names, such as: CORNOLAN, TOMMORROW, WILKIN, LEBBUTT, CRAGG VILLE, PECKET WELL, OLD TOWN, HEDDERY BRIDGE, MYTHOLMSTROY, BLACKBURN HEAD, EASTWOOD, BRADSHAW, BLINDWORTH, MEERDEN, BAINSFALLS, BOUND FABRIC, WHEATLEY, LEE MOUNT, OVERDEN, BOOTH TOWN, NORTHOWRAM, NORWOOD GREEN, LIGHTCLIFF BRIDGE, BALLYBRI, HOWE EDGE, PIPPERHOLMS, STUMP CROSS, KING CROSS, HALFAX, BARK TOP, SOUTHOWRAM, BRIGHOUSE, CLIFTON, RASTRICK, FILLAND, WEST VILLE, GRESTLAND, COPLEY, MORLAND TOWN, SOWERBY BRIDGE, FRIENDLY, WILKIN, LUDGENDEN FAY, WORTON, MEERLEY, LUDGENDEN, TRIANGLE, MILL BANK, RIFFORD, BARNESLAND, HOLWELL GREEN, STANLAND, OUTLAND, and BIRKBECK. The map also shows the surrounding rural areas and the River Wharfe to the north.

Sieve Results

- 5.24 Out of the 1,634 sites assessed 832 were rejected and not taken forward for allocation in the 'Local Plan – Publication Draft' based on the sieves outlined above. The results of the sieve can be found in Appendix 1.

Stage 2b: Suitability

- 5.25 Comments from a range of consultees have been used alongside Planning Officers' judgement as a qualitative assessment of the suitability of sites. A traffic light scoring system (Red, Amber, and Green) has been used to highlight the potential impact of development on each site and where mitigation may be used to address these issues. Where there are no comments and the RAG score has been filled in then consultants have assessed the sites but do not have any comments (Where there are no comments Officers 'scored the site 'Green') the . Where there are no comments and the RAG score is not filled out then the consultees have not made an assessment of the site.
- 5.26 In the initial 'Site Allocations Assessment Methodology - April 2015' it was suggested that the performance of the sites were scored against a set of factors and then weighted against which factor was deemed more important. This way of scoring the sites was seen as too complicated and the weighting process unclear (*The factors were weighted in line with the academic method of 'Pairwise comparison'*) therefore, the

factors have been used differently in this iteration of the methodology. The factors detailed in section 4.2.2.1 and 4.2.2.2 will be used to support the qualitative assessment and the remaining factors from the original Site Assessment Methodology will be used for accessibility. For each topic area the assessment process is set out below. A score was assigned to each factor recommendation to assist in the later sequential test.

Site Survey

5.27 A field and desktop survey was undertaken of sites after the initial “sieve” to determine some key characteristics including:

- Existing land use - the existing land use needs to be verified to check the site use is what it has been submitted as, and as to whether it is greenfield or brownfield.
- Adjacent land use - areas adjacent to the proposed site will be identified to make sure the uses are compatible and to ensure there are no significant impacts from 'bad neighbours' on the submitted or adjacent sites. E.g. a residential allocation adjacent a commercial site may be classed as a ‘bad neighbour’.
- Site characteristics and constraints - these need to be identified to establish whether constraints of the sites will render the site undevelopable. For example, unsuitable topography, contamination, etc.
- Site boundary - the appropriateness of the site boundary needs to be considered as to whether it is logical. If it is not, then there may be a need for further site rationalisation.

5.28 The information recorded in the site survey and desktop appraisal was used with the consultees comments to assess the sites. A copy of the site survey form is provided in Appendix 2.

Previously Developed Land

5.29 One of the NPPFs core planning principles is to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”. It is also a notable factor for the Council and a concern to local residents of the need to use brownfield land before greenfield; therefore, we have scored the efficient use of land as such:

Topic Area	Scoring	
Is the site an efficient use of land?	3	Brownfield
	2	Partially Brownfield
	1	Greenfield

Physical Constraints

5.30 There are areas of land throughout Calderdale which are potentially unstable (see appendix 3). The British Geological Survey (BGS) carried out a survey of landslips and areas of potential instability for the Council in 1998 and these are identified on the Proposals Map. Showing these broad areas of past and potential instability in

Calderdale will raise awareness to fully investigate the situation on sites in bringing forward development proposals.

- 5.31 Topography is also a constraint in Calderdale. The most viable sites are likely to be flatter sites. Therefore, the following scores apply:

Topic Area	Scoring	
Are there any physical constraints?	3	Relatively Flat
	2	Gentle undulations/Gentle Slope
	1	Steep Slope/Undulations and/or Unstable Land

Site "Show-stoppers"

- 5.32 There are four “show-stoppers” - Flooding, Highways, Ecology and logical settlement boundary. If the recommendation from the consultee is to remove/withdraw the site then it will be filtered and not allocated within the Local Plan at this stage. Planning Officers would require further evidence submitted to disprove or overcome the constraints as identified by the statutory consultee to consider the site for future allocation.

Flooding

- 5.33 Calderdale has a long history of flooding therefore the Council does not wish to exacerbate the issue where inappropriate development can be avoided or the risk mitigated. JBA Consulting was commissioned to undertake flood risk assessments as part the site allocation process. JBA have undertaken a Flood Risk Assessment Level 1 (Screening Study¹²) and made recommendations for all sites over 0.25ha which show potential for allocation.

- 5.34 There are five recommendations:

- Strategic Recommendation A - consider withdrawing the site based on significant level of flood risk;
- Strategic Recommendation B - Exception Test required if site passes Sequential Test;
- Strategic Recommendation C - Consider site layout and design if site passes Sequential Test;
- Strategic Recommendation D - Site-specific FRA required; and
- Strategic Recommendation E - Site permitted on flood risk grounds due to little perceived risk, subject to consultation with the LPA / LLFA.

¹² Level 1 Strategic Flood Risk Assessment - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/environment#flood-risk>

Topic Area	Scoring			
Flood Risk RAG Scoring	3	Little	Perceived	Flood Risk (Recommendation E)
	2	Potential Flood Risk where mitigation is required (Recommendation B, C, D)		
	1	Significant level of Flood Risk (Recommendation A)		

5.35 JBA have at times made the recommendation that sites be removed based on the percentage of the site within certain types of flood zones or surface water flooding. However, if a Planning Officer considers the redrawing of a boundary would exclude the risk area and provide a sensible site boundary with a developable area above the 0.25 ha threshold then they have done so. If the site cannot be redrawn then site is filtered and will not be assessed further.

5.36 Following the Level 1 SFRA, 12 potential development sites were identified where further more detailed site-specific assessment was required through a Level 2 SFRA¹³. This assessment of sites included updated recommendations as to the likely suitability of each potential development site.

Highways and Transport

5.37 The requirement for growth as set out in the Local Plan will inevitably have an impact on the road network in the Borough and its surroundings. The sites have therefore been assessed by Highways England, the Council's Highways Development Management team and specialist highways and infrastructure consultants WSP to determine the impact of site selection on the strategic and local road network and site access issues.

5.38 Highways England has assessed individual sites on the strategic impact using the latest version of the Highways England Network Analysis Tool (NAT). They have not included small sites as Highways England does not consider they will contribute to any significant impact on the strategic road network.

5.39 Highways England has commissioned traffic modelling to determine the overall impact of Local Plan development proposals on the strategic road network in West Yorkshire. The findings are detailed in the Final Report of the West Yorkshire Infrastructure Study.

5.40 Highways England has commented on the level and location of any impact on the strategic road network, as well as the potential of cumulative impact; mitigation and the time frame of this mitigation. Based on the comments received the following scores will be applied:

¹³ Level 2 SFRA - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/environment#flood-risk>

Topic Area	Scoring	
Impact on the Strategic Road Network RAG Scoring	3	No significant impact on the strategic road network
	2	Impact on the strategic road network requiring mitigation
	1	Significant impact on strategic road network with no possible mitigation

5.41 Highways Development Management has assessed the sites in terms of site access. Highway Development Management criterion (see appendix 5) are utilised to assess each site on an individual basis solely in terms of access to each site. There are a high proportion of sites that require further technical assessment to ensure that mitigation work where appropriate is defined and is feasible, however this would be at application stage.

5.42 There are six Highways Development Management recommendations:

- Recommendation A – Developable;
- Recommendation B - Developable with mitigation;
- Recommendation C - Developable if Third Party Land available;
- Recommendation D - Developable with reduced number of dwellings;
- Recommendation E - Not desirable with new Access off “A” Class Public Highway; and
- Recommendation F - Not developable

Topic Area	Scoring	
Site Access RAG Scoring	3	No access concerns (Recommendation A)
	2	Potential access concerns which are resolvable (Recommendation B, C, D, E)
	1	No access achievable (Recommendation F)

5.43 In order to understand the cumulative impact of development generated traffic, WSP consultants are in the process of undertaking modelling work using the Saturn model (*SATURN (Simulation and Assignment of Traffic to Urban Road Networks)* which is a tactical transport model that estimates the traffic volume on each link of a road assuming a fixed trip matrix). Using this Planning Officers will score each site against the following:

Topic Area	Scoring	
Transport: Impact on the local road network RAG Scoring	3	No significant impact on the road network
	2	Impact on the road network requiring mitigation
	1	Significant impact on road network with no possible mitigation

- 5.44 As the evidence was still in preparation at the time of the site assessments the RAG score has been set to '2 - Impact on the road network requiring mitigation' for all sites apart from the sites within Green Belt around the Hipperholme Cross Roads which have been set to '1 - Significant impact on road network with no possible mitigation' due to the reasons set out below.
- 5.45 The Highways Evidence¹⁴ consists of a range of studies and highlights future improvement works required to mitigate against the Borough's future growth.

Hipperholme Cross Roads

- 5.46 The Transport evidence which supports the Local Plan states in Technical Note 5: 'Hipperholme Sensitivity Test'¹⁵ that it can be clearly demonstrated that the Hipperholme cross roads junction is at an unacceptable level of congestion currently and worsened by the overall predicted growth in traffic as a result of the wider Local Plan allocations. WSP who undertook the work demonstrate that the A58/A649 cross roads is at or close to capacity and any upgrade would likely be of large scale, requiring significant works, funding and third party land. Based on modelling, WSP have indicated that 57% of the impact on the cross roads would come from Hipperholme itself. WSP have therefore advised that additional land is not released for allocation and that only land within the urban area should be considered for allocation. Sites which fall within Green Belt within the Hipperholme exclusion zone will be filtered and not allocated within the Local Plan. The in-combination effects of additional land released from the Green Belt within the Hipperholme area will have a significant and demonstrable detrimental impact on the A58 / A644 junction, outweighing the benefits attributable to the additional housing. Future allocation of the sites will be dependent on mitigation which will relieve the pressure of congestion on this junction. The boundary below shows the exclusion zone for Hipperholme allocations.

¹⁴ Transport Evidence - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/transport>

¹⁵ Technical Note 5: 'Hipperholme Sensitivity Test' - <https://www.calderdale.gov.uk/environment/planning/planning-policy/evidence-base/transport.html>

The map displays the Hipperholme Exclusion Zone, which is a large, irregularly shaped area shaded in light orange with diagonal hatching. This zone is bounded by a thick red line. Within this zone, there are several smaller areas with different hatching patterns: a central area with pink diagonal hatching, and several other areas with orange diagonal hatching. The map also shows the Green Belt, which is the unshaded green area surrounding the exclusion zone, and the Calderdale Boundary, which is marked by a thick black line. Various locations are labeled on the map, including Upper Hall Farm, Top of the Hill, Windmill Hill, Slump Cross, Upper Clay, Sunny Bank Farm, Hipperholme, The Storey, Lightcliffe, and Hipperholme Edge. A legend in the bottom left corner identifies the symbols used: a red hatched box for the Hipperholme Exclusion Zone, a green box for the Green Belt, and a black box for the Calderdale Boundary. Below the legend, there is a reproduction notice from HMSSO, dated 2017, with a licence number 100023069.

Reproduced by permission of Ordnance Survey on behalf of HMSSO
© Crown Copyright and database right 2017.
Ordnance Survey Licence number 100023069.

Natural Environment

- 5.47 Sites have been assessed against the presence of international, national and locally designated biodiversity and geological sites. The impact of development options have been scored in line with responses from Natural England, West Yorkshire Ecology (WYES) and West Yorkshire Wildlife Trust. The Canal and Rivers Trust have also submitted comments which are addressed by the above consultees.
- 5.48 Natural England's purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Each potential site allocation has been examined with regards to Natural England's SSSI Impact Risk Zones and other data within Natural England's remit. SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the gov.uk website. Comments have been made for those sites which cause concern for Natural England.
- 5.49 The key role of WYES is to provide informed and authoritative advice and information to the planning authorities in West Yorkshire to help conserve the most significant biodiversity habitats and species. WYES is the body responsible for the Local Sites Partnership as well as surveying, assessing and recommending designation of wildlife and geological sites for strategic planning documents. WYES has provided comments and suggested mitigation for the site allocations in terms of impact on SSSI's, Local Wildlife Sites, Local Geological Sites, Habitats of Principal Importance, Species of

Principal Importance and Habitat Networks. WYES has provided revised site boundaries which have been used to refine the allocation boundary or indicative developable area.

5.50 The Yorkshire Wildlife Trust (YWT) works across the Yorkshire and Humber region managing more than 95 reserves and has a membership of over 40,000. The YWT is the second oldest of the 47 Wildlife Trusts which work in partnership to cover the whole of the UK. The Trust's principal vision is to work towards a Yorkshire, rich in wildlife, valued and enjoyed by people. Yorkshire Wildlife Trust has reviewed the potential allocation sites for impacts on ecology, nature conservation and designated sites.

5.51 Sites have been scored in relation to the impact on biodiversity or the geological value of the site or surrounding land using the following:

Topic Area	Scoring	
Biodiversity RAG Scoring	3	No impact on environmentally sensitive areas
	2	Some impact on environmentally sensitive areas which can be mitigated against
	1	Significant impact on an environmentally sensitive area

5.52 If any ecological concerns are resolved by changing the developable area of the site or there have been no comments then the site will be scored '3 - No impact on environmentally sensitive areas'. Concerns only partially resolved by boundary changes, where mitigation is still required will be scored '2 - Some impact on environmentally sensitive areas which can be mitigated against' where redrawing of boundaries or mitigation could reduce the significance of the constraint to an acceptable level; and if West Yorkshire Ecology has recommended the site to be removed then the site will be scored '1 - Significant impact on an environmentally sensitive area' and the site will not go forward for allocation.

Logical Settlement Boundary

5.53 The final "show-stopper" is to assess whether the site is a logical extension to a settlement. If the site is disconnected from the existing Urban Area then the site will be filtered and not allocated within the Local Plan. The sites have been scored against the following using the Urban Area boundary:

Topic Area	Scoring	
Is the site a logical extension to a settlement? RAG Scoring	3	Within Settlement or edged on 3 sides
	2	Edged on 1-2 sides
	1	No Relationship

Showstopper Results

- 5.54 Out of the 1,634 sites assessed 311 sites were rejected based on the “show stopping” factors and not taken forward for allocation in the ‘Local Plan – Publication Draft’. The results of the remaining filtered sites can be found in Appendix 12.

Other Suitability Factors

- 5.55 The remaining suitability factors have been considered and although their recommendation are not classed as "show-stoppers" great weight is given to them when there are serious concerns over a site.

Open Space, Sport and Recreation

- 5.56 Access to open space, playing fields or amenity space is important for maintaining active healthy lifestyles. Calderdale has undertaken an ‘Open Space, Sport and Recreation Study’¹⁶ where sites were surveyed in terms of quantity, quality, accessibility and value.
- 5.57 A Playing Pitch Strategy¹⁷ for Calderdale has been undertaken. Its purpose is to ensure the provision of outdoor playing pitches meets the needs of existing and future residents within Calderdale. The results from this study have also helped influence the allocations within the Local Plan.
- 5.58 Safer, Cleaner, Greener who has responsibility of Open Space in the district has analysed the Open Space within the catchment area of a site against the adopted standards as set out in the Open Space Study. The following scores have been applied to the comments received by Safe, Cleaner, Greener:

Topic Area	Scoring	
Open Space RAG Scoring	3	No loss/No Impact
	2	Loss which is not required or can be replaced elsewhere
	1	Loss of important space

Landscape

- 5.59 The Council commissioned a Landscape Character Assessment (LCA)¹⁸ in order to identify and describe the variations and unique character of the landscape which makes it distinctive and valued. The LCA can be then used to assess the sensitivity of

¹⁶ Open Space, Sport and Recreation Study - <https://www.calderdale.gov.uk/environment/planning/planning-policy/evidence-base/Open-Space-Sport-and-Recreation-Study.pdf>

¹⁷ Playing Pitch Strategy - <http://thornhill/residents/environment-planning-and-building/planning/planning-policy/evidence-base/open-space>

¹⁸ Landscape Character Assessment - <http://www.calderdale.gov.uk/environment/planning/planning-policy/evidence-base/environment/6554-Calderdale-LCA-and-SLA-report-28-10-16-comp.pdf>

the character of areas and whether development proposals will have an impact on the landscape.

- 5.60 The most important landscapes of the district need to be safeguarded and have therefore been designated Special Landscape Area (see appendix 4). An area to be designated a Special Landscape Area has to meet both of the two 'Practical Criteria' and at least one of the four 'Landscape Criteria' listed in the LCA. Within these areas, development which would adversely affect landscape quality will not be permitted. Therefore the following scoring has been used:

Topic Area	Scoring	
Impact on the landscape RAG Scoring	3	Outside Special Landscape Area
	2	Partially within Special Landscape Area
	1	Within Special Landscape Area

Historic Environment

- 5.61 The historic environment has a range of heritage assets including Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, Archaeology sites and Historic Parks and Gardens. The assessment of the impact of development on heritage assets has been sought from Historic England, West Yorkshire Archaeology Advisory Service (WYAAS) and the Council's Conservation (Heritage) team.
- 5.62 Historic England are the public body with the responsibility of looking after England's historic environment who champion and protect historic places, helping people understand, value and care for these assets. WYAAS' key role is to provide informed and authoritative advice and information to Planning Authorities in West Yorkshire to help conserve the most significant heritage sites that are affected by development proposals. The Council's Conservation team's role is to encourage the conservation of the built environment by providing specialist advice on the protection and enhancement of conservation areas and historic buildings.
- 5.63 Where Historic England identified concerns over a site's proximity to a heritage asset, the Council's Conservation team have undertaken a Heritage Impact Assessment (HIA)¹⁹. The purpose of the HIA is to identify and consider the significance of the historic environment and the likely impact of the allocation on affected heritage assets, both designated and non-designated and provide advice as to whether such impact can be mitigated. If the impact can not be mitigated the site was filtered. Based on the consultees comments the following scores have been applied:

Topic Area	Scoring	
Impact on Heritage Assets RAG Scoring	3	No impact on heritage asset
	2	Some impact which could be mitigated
	1	Significant adverse impact

¹⁹ Heritage Impact Assessments: <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/historic-environment>

- 5.64 Where sites are located within close proximity of a Heritage Asset and there are no comments from Historic England or the Conservation team, the Council have scored this 'Green - No impact on any heritage asset'.

Housing Services

- 5.65 The Housing Service ensures that Calderdale builds the houses needed for its future residents and improves the housing we already have to a good condition. When assessing the potential sites for housing in the Local Plan, Housing Services looked at the facilities and infrastructure within the vicinity that help to create a sustainable community including existing or planned improvements to transport links (highways/ bus routes/ train links/ sustainable travel such as cycle paths), local amenities (such as shops, schools, open space) and the topography of the site (whilst understanding that many sites in Calderdale have challenges and opportunities linked to the topography). They have made comments on the sites in response to their service remit and the following scores reflect these comments:

Topic Area			Scoring	
Housing Services RAG Scoring			3	Positive
			2	Neutral
			1	Negative

Business and Economy

- 5.66 The Business and Economy Team provides support to businesses in Calderdale, across a wide range of economic development issues.
- 5.67 Business and Economy assessed the sites with the presumption of safeguarding employment land for the long term as the Council have particular concerns with the potential loss to other uses. The aim is to try to maximise the number of employment sites in all parts of Calderdale. Allocation of new employment sites in the new Local Plan ensures land for businesses to grow.
- 5.68 The Council commissioned Nathaniel Lichfield & Partners (NLP) to undertake an Employment Land Study [ELS]²⁰ for the Borough in June 2016. The study provides an important part of the evidence base that informs the preparation of the new Local Plan. Part of the study analyses the suitability and deliverability of available sites to meet future needs under a range of growth scenarios. It recommends which sites should be retained for employment uses which sites should be released for alternative uses and any need for additional sites. This evidence has been used to support the recommendations for the site allocation uses. The following scores reflect Business and Economy's comments:

Topic Area			Scoring	
Business and Economy RAG Scoring			3	Positive
			2	Neutral
			1	Negative

²⁰ Employment Land Study: <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/employment>

Minerals

- 5.69 The purpose of Mineral Safeguarding Areas (MSA) (see appendix 6) is to protect known locations of specific minerals resources of local and national importance, ensuring they are not needlessly sterilised by non-mineral development. Designation of MSAs does not carry a presumption that any resources will be worked, nor do they preclude other forms of development taking place. Non mineral development (apart from certain exempt minor developments) will be expected to investigate the potential for extraction of the mineral resource prior to the development taking place. Minerals related infrastructure, such as concrete batching plants are also within the MSA.
- 5.70 The MSA buffer zone is proposed in order to ensure that any site assessment considers not only the minerals immediately beneath the site, but also the effect of the development on mineral resources beyond that, therefore they prove useful in protecting the mineral resource from incompatible neighbouring uses, but also protect residents and other businesses from noise and dust impacts from quarrying. Therefore the following RAG scoring will apply:

Topic Area	Scoring	
Mineral Resources RAG Scoring	3	Outside MSA or within buffer
	2	Within MSA
	1	Working Mineral Site

Environmental Health

- 5.71 The key focus of the Council's Environmental Health department is to improve the environment and safeguard the health, safety and wellbeing of everybody living in the Borough. Environmental Health will comment on the sites as to whether the uses are compatible in relation to:

- Noise nuisance
- Air pollution
- Contaminated Land
- Drainage
- General nuisance
- Local air quality management

- 5.72 Based on Environmental Health's comments the following scoring is applied:

Topic Area	Scoring	
Environmental Health RAG Scoring	3	There is no detrimental effect
	2	There is no significant detrimental effect that cannot be mitigated against
	1	Significant detrimental that cannot be mitigated against

Agricultural Land

- 5.73 The NPPF emphasises the importance of local authorities in taking into account the economic and other benefits of the best and most versatile agricultural land. The government also affirms the importance of protecting soils and the services they provide. The Calderdale district does not have any excellent or very good (Grade 1 & 2) agricultural land (see appendix 7). However, there is some Grade 3 moderate/good) agricultural land in the east of the district. We therefore wish to protect good quality agricultural land where possible. The following scores will be applied:

Topic Area	Scoring
Agricultural Land Classification(ALC)	3 Lies within 4 or 5 (and urban)
Land areas	2 Lies within Grade 3
RAG Scoring	1 Lies within Grade 1 and 2

Accessibility

- 5.74 Accessibility to local services and facilities has also been considered. A core objective of the Sustainability Appraisal is to improve accessibility to essential services, facilities and employment. Therefore, the preference is for allocations to be in close proximity to the services and facilities listed below. However, the accessibility indicator also identifies potential shortfalls in the sites locality which could be addressed through the Infrastructure Delivery Plan.

Factors	RAG Score		
	3	2	1
Distance to Bus Stop with a service at least every 30 minutes	Less than 400m	Between 400m and 2km	More than 2km
Distance to Railway Station	Less than 800m	Between 800m and 2km	More than 2km
Distance to Public Accessible Parks	Less than 600m	Between 600m and 2km	More than 2km
Journey time to Town Centres	Less than 15 minutes	Between 15 and 30 minutes	More than 30 minutes
Journey time to Shops Selling Day-to-day goods	Less than 15 minutes	Between 15 and 30 minutes	More than 30 minutes
Journey time to Hospital/Walk-in centre	Less than 30 minutes	Between 30 and 60 minutes	More than 60 minutes
Journey time to General Practitioner	Less than 15 minutes	Between 15 and 30 minutes	More than 30 minutes
Journey time to Primary School	Less than 15 minutes	Between 15 and 30 minutes	More than 30 minutes
Journey time to Secondary School	Less than 20 minutes	Between 20 and 40 minutes	More than 40 minutes

Factors	RAG Score		
	3	2	1
Journey time to Higher Education	Less than 30 minutes	Between 30 and 60 minutes	More than 60 minutes
Journey time to Primary Employment Areas	Less than 20 minutes	Between 20 and 40 minutes	More than 40 minutes

5.75 It is the SA which assesses sites against the above factors; however, the Council wanted to highlight the distance to some services and facilities as part of the site assessment report to demonstrate accessibility.

5.76 Distances and journey times are based on the existing road network, therefore large greenfield sites may indicate a longer distance or travelling time as the parameters used to generate the RAG scores may not pick up the centroid of the site. Maps of the above factors and the parameters used can be found in Appendix 8.

Green Belt Review

5.77 The purpose of the Green Belt Review²¹ was to provide an understanding of the current strengths and weaknesses of the existing Green Belt and provide the basis for recommendations to change the Green Belt where appropriate to provide certainty for the next 30 years or more. The current Green Belt boundary is very tightly drawn around the Borough's towns and villages, minimising the potential to accommodate growth over the longer term. Calderdale's Green Belt Review was well overdue as was highlighted within the Inspector's Report into the RCUDP due to the incremental incursions into the Green Belt during the preparation of the UDP and RCUDP. The NPPF context has allowed for strategic revisions of the Green Belt through the Local Plan process. Identifying the purposes the sites fulfil has assisted in choosing the site allocations (For further information please see the Green Belt Review Methodology²²).

5.78 Whilst the Green Belt Review assessed parcels of land that were identified using criteria outlined in paragraph 5.11 of the Review, the Green Belt Parcels does not directly relate to the individual sites that are proposed for allocation in the Local Plan. Using the same methodology as the Green Belt Review, proposed development sites in the Local Plan that are located in the Green Belt have been assessed against the Green Belt purposes in the NPPF using the boundaries of the site itself.

5.79 The results of the Green Belt Review of sites can be found in Appendix 11. This list includes sites which have now been filtered. The reasoning of these sites rejection can be found in the Site Allocation Assessment Report.

²¹ Green Belt Review Results - http://calderdale-consult.limehouse.co.uk/portal/planning_services/gbr16/gbr16

²² Green Belt Review Methodology - <https://www.calderdale.gov.uk/environment/planning/planning-policy/evidence-base/environment/index.html>

Sustainability Appraisal

5.80 The sites have been assessed against the Sustainability Appraisal (SA)²³. The SA considers all the likely impacts, cumulative impacts, and the scope for mitigating any possible negative impacts on the environment, economic and social factors of sustainable development. It also considers whether the site allocations meet the strategic policies of the Local Plan. The SA assists with identifying mitigation of any potential concerns raised during the site assessment. Each of the sites has had an SA which can be found in the link below.

Stage 3: Development Potential

5.81 Based on the comments received from the consultees a proposed allocation has been made by Planning Officers for a New Housing Site, a New Employment Site or a Mixed Use Site. Where consultees have recommended areas of the site to be removed due to potential constraints this has been reflected in the indicative developable area of the site (See example in Appendix 9) This recommendation then forms part of the site specific consideration of the site when developers submit an application for the site.

5.82 The capacity of the remaining suitable sites was then then determined. The nPPG states that the estimation of the development potential of each identified site should be guided by the existing or emerging plan policy including locally determined policies on density.

5.83 In terms of the residential densities, the potential quantity of housing that could be delivered on each site was determined using the density multipliers set out in the Council's SHLAA²⁴. The preferred approach was to employ a range of density multipliers to provide an indicative capacity. These are set out below:

Location	Site Size	<0.4ha	0.4-2ha	>2ha
	Gross to Net Ratio	100%	90%	75%
		dph	dph	dph
Town Centres	Gross Density	60	60	60
	Net Density	60	54	45
Near Public Transport Nodes(e.g. Rail Station 800m)	Gross Density	50	50	50
	Net Density	50	45	38
Walking distance of town centres (750m)	Gross Density	50	50	50
	Net Density	50	45	38

²³Sustainability Appraisal -

<https://www.calderdale.gov.uk/environment/planning/planning-policy/evidence-base/sustainability-appraisal.html>

²⁴SHLAA - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/homes#land-available>

Location	Site Size	<0.4ha	0.4-2ha	>2ha
	Gross to Net Ratio	100%	90%	75%
		dph	dph	dph
Other urban areas	Gross Density	40	40	40
	Net Density	40	36	30
Rural areas	Gross Density	35	35	35
	Net Density	35	32	26

5.84 Those sites having the benefit of an outline or expired planning permission, masterplan or appropriate proposed layout, the site capacity was amended to reflect the suggested capacity within these documents.

5.85 In terms of Employment Sites, the assessment of the amount of land to be allocated in the Local Plan requires some flexibility. It is difficult to quantify the capacity of each site due to the different floorspace ratios each employment type yields. Each proposed employment site has an appropriate 'B'-use assigned (e.g. Offices, Industry and Warehouses). These 'B'-uses have been suggested by the Employment Land Review and Officer recommendation. The final use and capacity of a site will be determined at application stage. Further evidence and the justification for the employment site's capacity can be found in the Employment Technical Paper.²⁵

5.86 Similar to employment sites, new mixed use sites have a range of suggested appropriate uses based on the Employment Land Study and Planning Officer recommendation depending on neighbouring uses. If there is an element of residential, a more conservative capacity is suggested in order to prevent under allocation. If there is a residential element, the Council have used the above density multipliers on 50% of the site to reflect the mixed use nature of the site.

Stage 4: Availability

5.87 For a site to be expected to be deliverable over the plan period, a site has to be available. The NPPF states that "a site is considered available for development, when, on the best information available there is confidence that there are no legal or ownership problems, such as unresolved multiple ownerships, ransom strips tenancies or operational requirements of landowners."

5.88 Once the Council had a 'long list' of potential sites, using the information within the Call for Sites and using the Land Registry, the Council sent letters to all owners of the potential allocations to establish ownership and intentions for development. The questionnaire (see appendix 10) asks the owner to identify their intentions, whether the site has any constraints and when the site is likely to come forward.

²⁵Employment Technical Paper - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/employment>

- 5.89 The Council processed the questionnaire feedback during the ‘Local Plan – Initial Draft’ consultation as well as when more evidence was gathered on availability. When the Council was provided evidence demonstrating the site was not available then the site was filtered and not allocated within the Local Plan. The vast majority of sites have been confirmed as available; the availability of only a small proportion is unknown and these have been positioned in the later years of the trajectory as it anticipated that these are likely to be picked up by the market given housing need in the Borough.

Stage 5: Achievability

- 5.90 Viability, which is essential for demonstrating ‘achievability’, is an important part of the site allocation process. A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.
- 5.91 Consultants GVA have been appointed to undertake the viability testing of the Local Plan including site allocations. There has been a consideration of the viability of individual sites using an already tested, but updated model, to consider the viability of sites taking into account the implications of policy requirements and possible interventions that would be needed to unlock the site. Those sites which are deemed unviable have not been allocated in the ‘Local Plan – Publication Draft’ unless the Council has felt that the site could benefit by being promoted in the Plan for example brownfield sites where change in the economy could make the site viable later in the Plan period.
- 5.92 The viability testing will be continued to be updated as the Local Plan progresses to Examination and a viability report will be produced as part of the evidence base. The current viability report²⁶ can be found on the Local Plan Evidence Base.

Stage 6: Sequential Approach

- 5.93 The methodology so far has outlined how sites have been filtered (rejected) based on a number of factors. The sites that remained were considered potentially acceptable subject to agreeing a preferred option for distribution and the total requirement for housing and employment. However, there is significant variation in the nature of individual sites – sites vary from being previously developed in an urban area through to being green field in the Green Belt and Special Landscape Area. Green Belt sites also vary in relation to their contribution to the purposes of Green Belt. Numerous other criteria have been taken into account, and this information can be seen in the various site reports.

²⁶ Viability Report - <https://www.calderdale.gov.uk/v2/residents/environment-planning-and-building/planning/planning-policy/evidence-base/overall-planning-matters#viability-appraisal>

- 5.94 Based on the Council's preferred approach to objectively assessed housing need more sites were available than needed. Whilst some flexibility is considered necessary to facilitate market choice, the Council needs to be mindful that land can only be released from the Green Belt in exceptional circumstances.
- 5.95 In December 2017 Cabinet concluded that the method for refining the allocations should have regard to the sustainability of the site; strategic significance; ability to deliver wider regeneration and infrastructure benefits; the capacity for planned infrastructure to accommodate the growth; the impact on the Green Belt; and deliverability. This reflects the fact that good planning requires judgement and vision as well as analysis.
- 5.96 The inclusion of Garden Suburbs is a linked but separate issue to the overall spatial distribution discussed above. It is considered that the Garden Suburbs are a key opportunity for truly sustainable and transformational growth; and they are supported by, and support, the provision of transportation infrastructure. Given this, the preferred scenario builds in the assumption that the two garden suburb sites should remain amongst the preferred package of sites.
- 5.97 Furthermore if the Garden Suburbs are not included in the final selection of sites, it would be necessary to identify a much greater number of smaller allocations. If this were to happen it would be very difficult to plan effectively for the provision of infrastructure that requires substantial areas of land (for example schools). This potential scenario is illustrated in February 2018 Cabinet Report.
- 5.98 In order to identify the most sustainable sites a 'sequential' approach has been adopted that prioritises brownfield sites in the urban area, only using the most sensitive Green Belt when all alternative sites were used. This sequential approach has been tempered by consideration of strategic significance, and the ability to deliver wider regeneration and infrastructure benefits. The sequential priority for selection of sites is set out below:
1. Brownfield, Within Urban Area
 2. Mixed BF/GF, Within Urban Area
 3. Greenfield, Within Urban Area
 4. Brownfield, Within Green Belt
 5. Green Belt (Meets 0-2 of the identified purposes), Outside SLA, GF/BF
 6. Green Belt (Meets 0-2 of the identified purposes), Within SLA, GF/BF
 7. Green Belt (Meets 3-5 of the identified purposes), Outside SLA, GF/BF
 8. Green Belt (Meets 3-5 of the identified purposes), Within SLA, GF/BF
- 5.99 The sites were assessed by Planning Officers in order of the categories above, so the more sustainable and favourable sites in terms of brownfield and being located within the urban area were allocated first. The following factors were important in assessing whether a site should be allocated as a New Housing Site, New Employment Site, New Mixed Use Site or Filtered:
- The role and character of the area

- The need to promote the vitality of the main urban areas
- The need to protect Green Belt
- Recognising the intrinsic character of countryside
- Conserving and enhancing the natural environment
- Reducing pollution
- Preferring land of lower environmental value
- Utilising previously developed land if it is not of high environmental value
- Conserving heritage assets
- Managing patterns of growth – public transport, walking, cycling – locations which can be made sustainable

5.100 Comments from consultees were again considered. The site assessments had already taken these into account and in some circumstances, resulted in a site being “show stopped” and therefore filtered. However, even if issues were not so significant to result in the site being filtered initially, they could still result in a site being filtered at this qualitative assessment stage. Reasons for this included the cumulative effect of a number of different issues, potential impacts on the capacity of the site, considerations of viability, illogical settlement extensions and topography. The results of these can also be found in appendix 12.

Allocated Sites

5.101 The above stages set out the methodology for assessing the sites for allocation within the Local Plan. Out of the 1634 number of sites assessed, 114 have been allocated as New Housing Sites (including two Garden Suburbs) 15 as Mixed Uses Sites and 30 as Employment Sites. A list of these sites can be found in the ‘Local Plan – Publication Draft’ and Policies Map or in appendix 13. An example of the site assessment report can be found in appendix 14 which accompanies all sites apart from Sieved sites.

5.102 The comments and recommendations of the consultees have assisted in establishing a list of site specific considerations for each allocation. This will assist in the future for when planning applications are being prepared by highlighting potential constraints, reports and mitigation required.

5.103 For more information on housing requirement, supply and other housing related matters please see the Housing Technical Paper. For more information on employment requirement and justification for sites selected please see the Employment Technical Paper.