

CALDERDALE LOCAL PLAN

GREEN BELT REVIEW & GREEN BELT SITE ASSESSMENT SENSITIVITY TESTING PAPER

Calderdale Metropolitan Borough Council

24 December 2020



GREEN BELT REVIEW AND GREEN BELT SITE ASSESSMENT SENSITIVITY TESTING PAPER

The production of this paper has been necessitated following the Matter 12 hearing session on Green Belt and Allocation Policies General at stage 2 of the Examination into the Calderdale Local Plan dated 14th October 2020. Agenda item 2 of Matter 12 sought justification from the Council for the local interpretation of purpose IV in the Green Belt Review and the Green Belt Assessment of site options.

Purpose IV was originally developed to protect the character of nationally recognised historic towns and cities such as York and Cambridge. Since this time, other policy mechanisms such as Conservation Areas and Listed Buildings have been developed and widely used to protect historic settlement character across a wide range of settlement scales from large areas to small components of villages and their setting.

Calderdale has no nationally recognised historic towns but it has settlements with historic elements that should be respected. The Green Belt Review and the Green Belt Assessment of sites took a pragmatic approach to the consideration and assessment of the contribution that the Green Belt makes to the conservation of the built environment across the district. A localised interpretation of historic settlement has been applied in relation to the overall assessment as follows:

Historic Settlement - settlement or place with historic features identified in local policy or through conservation areas or other historic designations.

The assessment of this purpose primarily had regard to where there is a clear visual link between open space within the Green Belt and recognisable historic settlement patterns. This will often be indicated through the presence of a Conservation Area which directly abuts or extends across open land.

Following discussions at the Matter 12 hearing, the Inspector requested that the Council undertake sensitivity testing on Purpose IV for the Green Belt Review and the Green Belt Assessment of site options omitting Purpose IV in order to show if its omission changes the overall results/conclusions.

The results of this exercise are documented in this paper and should be read in context with the Green Belt Review (EV08.1 – EV08.12) and the Site Allocations Assessment Methodology – Appendix 11 – Green Belt Assessment of Sites (EV51.10).

RESULTS

Sensitivity Testing for Green Belt Review

Table 1: Purpose IV sensitivity testing for Green Belt Review

Parcel Number	Satisfies Purpose IV	5 purpose Outcome	Outcome without Purpose IV	Sensitivity Change	LP Site Reference	Allocation
GB108-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1610	Filtered
GB001-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1419	Filtered
GB022-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB026-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1463	Garden Suburb
GB042-00	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	LP1457 LP1636 LP1142 LP0841 LP0419 LP1003	Filtered
GB043-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1590	Additional New Housing Site
GB043-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1580 LP1457 LP1577	Filtered
GB044-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1457	Filtered
GB045-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1276 LP0042	Filtered
GB046-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0072	Filtered
GB050-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB051-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB062-00	Yes	Meets 0-2 of identified Purposes	Meets 0-2 of Identified Purposes	No Change	LP1203	New Employment Site

Parcel Number	Satisfies Purpose IV	5 purpose Outcome	Outcome without Purpose IV	Sensitivity Change	LP Site Reference	Allocation
GB062-00	Yes	Meets 0-2 of identified Purposes	Meets 0-2 of Identified Purposes	No Change	LP1202 LP1569 LP1203 LP1598 LP1597	Filtered
GB069-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB070-00	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	LP1437	Filtered
GB071-00	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	None	None
GB073-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1561	Filtered
GB075-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB103-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0920	Filtered
GB107-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB109-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0147	Filtered
GB110-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1610 LP0074	Filtered
GB111-00	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	LP1273	Filtered
GB112-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB121-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1448 LP1450	Filtered
GB139-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB141-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB143-00	Yes	Meets 3-5 of	Meets 3-5 of	No Change	None	None

Parcel Number	Satisfies Purpose IV	5 purpose Outcome	Outcome without Purpose IV	Sensitivity Change	LP Site Reference	Allocation
		Identified Purposes	Identified Purposes			
GB144-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0888	Filtered
GB163-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1402 LP0723	Filtered
GB164-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB166-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB184-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1348	Filtered
GB186-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB221-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0045 LP0280	Filtered
GB223-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0108	Filtered
GB242-00	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	None	None
GB249-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB296-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1564	Filtered
GB307-00	Yes	Meets 0-2 of identified Purposes	Meets 0-2 of Identified Purposes	No Change	None	None
GB313-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1360	Filtered
GB360-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB361-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0777 LP0776	Filtered
GB369-00	Yes	Meets 3-5 of	Meets 3-5 of	No Change	LP0924	Filtered

Parcel Number	Satisfies Purpose IV	5 purpose Outcome	Outcome without Purpose IV	Sensitivity Change	LP Site Reference	Allocation
		Identified Purposes	Identified Purposes			
GB376-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB387-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP0144 LP0041 LP0951 LP0346	Filtered
GB390-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB395-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB402-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1243	Filtered
GB404-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	LP1491 LP0872	Filtered
GB253-00	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	None	None
GB252-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB250-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None
GB254-00	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	None	None

Sensitivity testing identifies 53 Parcels where Purpose IV is satisfied in the Green Belt Review. Of these, 6 Parcels experience a sensitivity change when Purpose IV is omitted from the assessment all of which change the parcel from most sensitive Green Belt to medium sensitive Green Belt. Whilst none of these sensitivity changes affect any allocations for development proposed by the Council, they do affect 8 filtered sites; LP0419, LP0841, LP1003, LP1142, LP1273, LP1437, LP1457 and LP1636. Purpose IV is considered to be satisfied in 3 parcels where an allocation is proposed but none of these experience a change in parcel sensitivity if Purpose IV is omitted from the assessment.

LP0419 is a working mineral site with permission until 2042. It has therefore been filtered and has not been allocated in the Local Plan.

LP0841 was filtered on ecological grounds as the entire site comprises lowland mixed deciduous woodland. As a result, the Council’s Ecologist recommends that the site should be removed from the Local Plan.

LP1003 and LP1142 are greenfield sites that are located within a Special Landscape Area and the Warley Town Conservation Area. The sites were not taken forward in the Local Plan due to the negative impacts of development on heritage assets and the Special Landscape Area.

LP1273 is located within a Special Landscape Area and Planning permission has been granted for use of part of the land for allotments, orchard and woodland planting; and tree planting has taken place. This would mean that the western part of the site is not developable. Further, Highways Development Management officers have concluded that the site is not developable. The site has therefore been filtered and has not been taken forward as a potential site allocation.

LP1437 is considered to contribute to the setting of the Luddenden Conservation Area and development of the site would fundamentally change the historic character of the area and destroy the view and setting of heritage assets causing substantial harm. The Heritage Impact Assessment concluded that there would be no mitigation measures effective in reducing harm. The site is also within a Special Landscape Area where further development could impact on the setting. The site was therefore filtered and was not allocated in the Local Plan.

LP1457 was considered for allocation as a Sustainable Urban Extension in the ‘Potential Sites and Other Aspects of the Local Plan’ consultation in 2015, along with 13 other areas identified as potential urban extensions. The balance of evidence indicated that Brighouse and Rastrick should be the key focal points for new residential development due to the availability of land and their relative sustainability, with fewer potential impacts on the important environmental designations in the west of the District. Brighouse and Rastrick are close to the M62 and the border with Bradford and Kirklees. Brighouse as a town is also likely to benefit from capacity improvements to the A641 and A644. In addition, it is considered that development in this part of the Borough would lead to significant adverse impacts on Warley Conservation Area and other listed assets.

LP1636 was filtered because the site is below the site allocation threshold of 0.25ha.

Sensitivity Testing for Green Belt Assessment of Site Options

Table 2: Purpose IV sensitivity testing for Green Belt assessment of site options

Site Number	Satisfies Purpose IV	5 Purpose Outcome	Outcome without Purpose IV	Sensitivity Change	Allocation
LP0041	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	Filtered
LP0075	Yes	Meets 0-2 of Identified Purposes	Meets 0-2 of Identified Purposes	No Change	Filtered
LP0146	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	New Housing Site

Site Number	Satisfies Purpose IV	5 Purpose Outcome	Outcome without Purpose IV	Sensitivity Change	Allocation
LP0417	Yes	Meets 3-5 of Identified Purposes	Meets 0-2 of Identified Purposes	Less sensitive	Filtered
LP1629	Yes	Meets 3-5 of Identified Purposes	Meets 3-5 of Identified Purposes	No Change	Filtered

Sensitivity testing identifies 5 sites where Purpose IV is satisfied. Of these, 3 sites experience a sensitivity change when Purpose IV is omitted from the assessment all of which change the site from most sensitive Green Belt to medium sensitive Green Belt.

The omission of Purpose IV from the Green Belt assessment of site options impacts on two filtered sites; LP0041 and LP0417. LP0041 was filtered specifically on heritage issues. LP0417 was filtered on heritage issues and having regard to the Council’s housing need, the Local Plan’s spatial strategy, the supply of more suitable and available sites elsewhere and the need to protect the Green Belt as far as possible. In addition, the site is located in a Special Landscape Area where further development could impact on the setting. Even taking account of the revised Green Belt status of the site, it is considered that more sequentially preferable sites are available elsewhere.

The omission of Purpose IV from the Green Belt assessment of site options impacts on one site allocation; New Housing Site LP0146. The change is from most sensitive to medium sensitive Green Belt which is not considered to affect its allocation.

Conclusions

Sensitivity testing shows that the omission of Purpose IV from the Green Belt Review and the Green Belt assessment of site options would not impact on the allocations for development put forward by the Council. Whilst a small number of filtered sites would be affected by a sensitivity change in Green Belt status from most sensitive to medium sensitive, this change would not affect the Council’s decision to filter those sites with other factors determining this decision. Whilst one allocated site would experience a change in sensitivity due to the omission of Purpose IV, this change would be from most sensitive to medium sensitive and would not change the Council’s decision to allocate the site.