

Calderdale Local Plan

SITE LP0032 – MIXED USE ALLOCATION CONSULTATION

Calderdale Metropolitan Borough Council

February 2021



Calderdale Local Plan

Site LP0032 (including the adjacent former Crosslee factory) – Proposed Mixed Use Allocation Consultation

February 2021

1. Introduction

1.1 The Stage 2 Hearings to the Examination of the Local Plan concluded on Friday 4th December 2020. The Council are now working through the tasks and modifications resulting from the hearings. These can be found in [CC85 – Stage 2 Draft Task List](#). One of these modifications proposes to change LP0032 from a New Employment Site to a Mixed Use Site including additional land (i.e. the adjacent land that formerly accommodated the Crosslee factory).

2. Background

2.1 As part of the Local Plan Publication Draft 2018, site LP0032 was allocated as a 1.94ha Employment Site to the rear of the Crosslee factory. However, as demonstrated in the Hearing Statement [HS13.1](#) and the Statement of Common Ground between Crosslee and the Council, the site is not available or deliverable as a New Employment Site.

2.2 LP0032 was predicated on a situation that has now ceased to exist – i.e. further employment development/expansion to the rear of the Crosslee factory. Given recent demolition of the factory it is considered that the site of the factory (which has not to date been given any particular consideration through the Local Plan) and LP0032 should be reconsidered as a whole through the Local Plan.

2.3 The Statement of Common Ground proposes the factory and LP0032 should be allocated as a single Mixed-use site with a requirement that an equivalent amount of ‘B’ class employment, as could have been provided on LP0032, is provided somewhere within the wider site.

2.4 The Council has now undertaken a site assessment of this larger site LP0032 (See Appendix 1) in line with the Site Allocation Assessment Methodology ([EV51.1](#)), including consultation with the Council’s Business and Economy team along with other key consultees, and a Sustainability Appraisal (See Appendix 2). These assessments have determined the wider site is suitable for Mixed Use allocation. The Council also commissioned a Mixed Use Site Capacity Assessment ([CC72](#)) which also recommended that the site boundaries should be extended and the allocation changed from a New Employment Site to a Mixed Use Site.

2.5 As part of the Local Plan Examination Hearings and in light of the proposed modifications set out in the Hearing Statement and the Statement of Common Ground, the Inspector has asked the Council to include the following items as tasks in CC85:

- LP0032 – Additional wording in the Site Specific Considerations of Appendix 1 to state that the Transport Statement must demonstrate traffic would be no worse than the previous employment use relating to severe impact. (Item 82)
- LP0032 as an employment site needs to be deleted. The site is confirmed as not deliverable for employment so this can be done prior to consultation as a Mixed Use site. (Item 83)
- LP0032 - As this is now a new site there needs to be consultation before Main Modifications otherwise if a main modification is proposed to the plan to include it there may need to be an extra hearing session. (Item 84)

- LP0032 - Take account of Use Class Order changes that came into effect during 2020. (Item 85)

2.6 The Inspector has requested under item 84 that a consultation is undertaken to seek views from stakeholders and local communities on this potential modification. The new site specific consideration listed in item 82 has been included in 'Appendix 1: Site Allocations – Supporting Information' which can be seen in the table below. However, as the Council is still working through the implications of the changes to the Use Class Order under item 85, a note will be produced and added to the Examination Library and the consequential changes to the Plan will be incorporated and consulted on through the Main Modifications. The site will only be deleted as an Employment Allocation if it is still deemed suitable to allocate as Mixed Use after this consultation.

3. Consultation

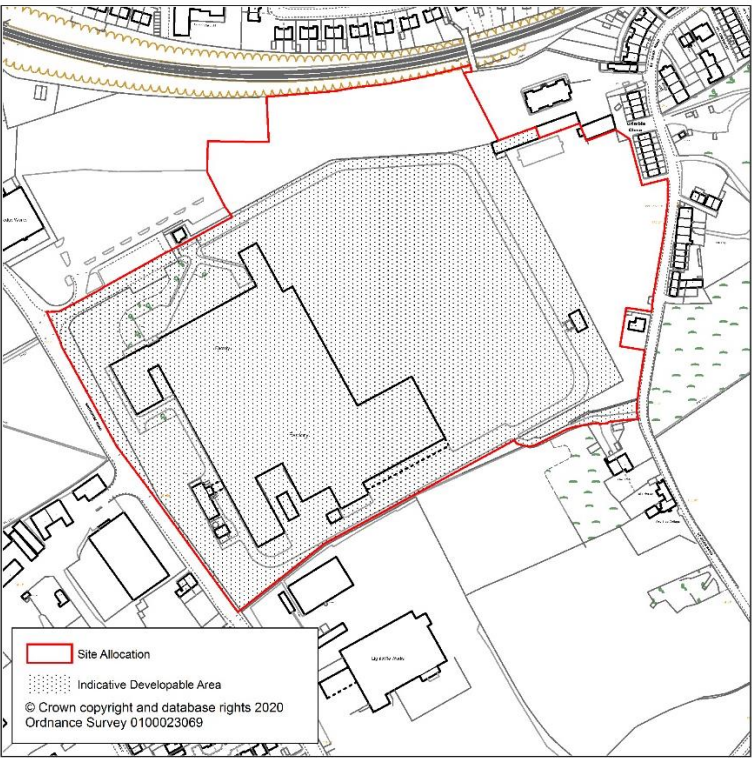
3.1 The Council proposes a main modification to 'Policy SD5 Allocated Employment Sites – Brighouse' to delete site LP0032, and a main modification to 'Policy SD6 Allocated Mixed Use Sites – Brighouse' to insert site LP0032 (including additional land) as a new Mixed Use Allocation. These main modifications include subsequent changes to 'Appendix 1 Site Allocations – Supporting Information' which identifies the site boundary and indicative developable area; as well as listing potential constraints, reports required, and relevant site specific considerations.

3.2 LP0032 will be deleted from Policy SD5 Allocated Employment Sites – Brighouse and the following additional row will be added to Policy SD6 Allocated Mixed Use Sites – Brighouse:

Policy SD6 Allocated Mixed Use Sites – Brighouse						
Local Plan Site Reference	Location	Gross Site Area (ha)	Indicative Developable Area (ha)	Appropriate Uses	Total B* Indicative Floorspace (sq.m.)	Total No. of dwellings
LP0032 Supporting Information	Land at the former Crosslee PLC, Brighouse Road, Hipperholme, Brighouse, HX3 8DE	10.90	8.56	C2, C3, E (Retail), E (B2 Employment Uses), F.1	8,000	182

**The presentation of previously B Use Class which has been amalgamated under E Use Class is yet to be determined.*

3.3 The following additional table will be added to Appendix 1 Site Allocations – Supporting Information:

Appendix 1 Site Allocations – Supporting Information	
Site number LP0032	
Land at the former Crosslee PLC, Brighouse Road, Hipperholme, Brighouse, HX3 8DE	
Site area (Ha)	10.90
Indicative developable site area	8.56
Appropriate uses	C2, C3, E (Retail), E (B2 Employment Uses), F.1
Total B* floorspace (sq.m)	8,000
Total No. of Dwellings	182
Land type	Mixed
Ownership	Private
	 <p>The map shows a site allocation outlined in red, with an indicative developable area shaded in grey. The site is located near a road junction and a river. A legend indicates that the red outline represents the 'Site Allocation' and the grey shading represents the 'Indicative Developable Area'. The map also includes a copyright notice: '© Crown copyright and database rights 2020 Ordnance Survey 0100023069'.</p>
Constraints	<ul style="list-style-type: none"> - Potential for surface water flooding - Impact on A58 / A644 junction - Proximity to Grade II Listed Building (1 and 2 Yew Trees) - Archaeology (PRN 2599) - AQMA (No 7 Hipperholme) - Contaminated land - Lowland mixed deciduous woodland UK BAP Priority habitat - Wildlife Habitat Network including Grassland of wildlife value
Reports required	<ul style="list-style-type: none"> - Flood Risk Assessment supported by pre and post development hydraulic modelling - Site investigation (drainage) - Transport Assessment (including assessment of Hipperholme cross roads) & Travel Plan - Access proposals and mitigation proposals and design. - Noise Impact Assessment - Heritage Impact Assessment - Predetermination Archaeological Evaluation - Contaminated Land Assessment - Ecological Impact Assessment including Net Gain assessment using the Defra biodiversity metric and be informed by the species surveys recommended within the PEA
Site Specific Considerations	<ul style="list-style-type: none"> - Detail of sufficient mitigation measures for any flood risk identified, including provision of SuDS, ensuring access and egress in a flood event and proposals for emergency evacuation where applicable. - Good quality design and layout - Highway improvements to access

	<ul style="list-style-type: none"> - Highway mitigation likely to be required at Hipperholme Crossroads, subject to assessment - Transport statement should demonstrate traffic will be no worse than previous employment use relating to severe impact - Consideration of guidance in the West Yorkshire Low Emission Strategy - Mitigation for any noise impact - Implementation of the recommendations provided in the HIA or other suitable mitigation measures agreed by the Local Planning Authority to avoid or minimise the impact on the significance of heritage assets and their setting. - Wildlife Habitat Network should be excluded from the developable area and Grassland enhanced if possible. These considerations will be based on the outcome of the Ecological Impact Assessment. - On site open space should include a play area to the LEAP standard, an area for informal recreation and either an area for allotments/community garden or dwellings should have gardens of a sufficient size to enable the growing of fruit and vegetables.
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**The presentation of previously B Use Class which has been amalgamated under E Use Class is yet to be determined.*

3.4 This consultation is specifically seeking comments on the allocation of LP0032 and additional land as a Mixed Use allocation.

Appendix 1 – Site Assessment Report

Site Details

Eastings

412913

Northings

425047

Full Address

Land at the former Crosslee PLC, Brighthouse Road, Hipperholme, Brighthouse, HX3 8DE.

Ward

Hipperholme and Lightcliffe Ward

Local Plan Area

Brighthouse

Current RCUDP Allocation or Designation

Leeds Bradford Airport consult zone, New employment site, Primary employment area, Wildlife corridors

Land Type

Mixed

Topography

Relatively Flat

Site Area (ha)

10.90

Is the site an efficient use of land? RAG
Mixed

Current Land Use

Primary

Disused / Vacant Land

Secondary

Disused / Vacant Buildings, Woodland

Adjacent Land Uses:
North

Industrial / Commercial, Transport, Woodland

South

Industrial / Commercial, Residential

East

Residential, Woodland

West

Disused / Vacant Land, Industrial / Commercial

Public Consultation

To view comments made during the Local Plan - Initial Draft Consultation 2017, please visit:
http://calderdale-consult.limehouse.co.uk/portal/planning_services/lp17/lpid?pointId=ID-4395651-ISSUE-LP0032-REAR-OF-CROSSLIE-BRIGHOUSE-ROAD#ID-4395651-ISSUE-LP0032-REAR-OF-CROSSLIE-BRIGHOUSE-ROAD

Flooding

Flooding and Drainage Section

Comments

The site exists within built-up area. In general, existing infrastructure that is proposed to be utilised should be surveyed prior to ensure hydraulic and structural adequacy. Any proposed surface drainage system should look at incorporating SuDS and where this is not practical then satisfactory evidence should be submitted. The site should be surveyed to identify buried drainage infrastructure and connectivity. Discharge rate of surface water should be reduced from the site, the factor of reduction would depend on the outfall and can be agreed prior to submission of planning approval. Given the nature and size of development a flood risk assessment would be required supported by pre and post development hydraulic modelling and as a minimum with detail of sufficient mitigation measures for any flood risk identified, ensuring access and egress in a flood event and proposals for emergency evacuation where applicable.

Mitigation

Any proposed surface drainage system should look at incorporating SuDS.

Conclusion

No objection in principle.

Technical Information

Flood risk assessment would be required supported by pre and post development hydraulic modelling and as a minimum with detail of sufficient mitigation measures for any flood risk identified, ensuring access and egress in a flood event and proposals for emergency evacuation where applicable.

Flooding Zone Coverage

Flood Zone 1 (Area %)	100
Flood Zone 2 (Area %)	0
Flood Zone 3a (Area %)	0
Flood Zone 3ai (Area %)	0
Flood Zone 3b (Area %)	0

Surface Water Flooding

1 in 30 Year (Area %)	0.9
1 in 100 Year (Area %)	1.01
1 in 1000 Year (Area %)	3.2

Strategic Recommendation

Subject to FRA

Flooding RAG

Flooding issues which can be mitigated

Highways

Highways England

Comments

This site is located approximately 3 miles from M62 Junction 25. Given the distance between the site and the SRN, and the proposed development quantum, it is not considered that this site will severely impact the capacity, operation and safety of the SRN if it were to come forward.

Summary

Highways England Site Comments

Strategic Highway Network Status Level of impact

Location of primary impact ie nearest junction

Potential impact of non SRN traffic passing through the junction

Potential for cumulative impact

Committed mitigation schemes

Is additional mitigation likely to be required by 2028?

Ranking

Comments

Strategic Road Network RAG

No significant impact on the road network

Highways Development Management

Site Access

Site Observations and Planning Application

The proposed care home use would generate low levels of traffic in the peak periods. The residential, retail and industrial uses would likely generate higher levels of traffic than the former use. The impact on the local road network, in particular at the Hipperholme Crossroads which will need to be considered.

Vehicular accesses onto Brighouse Road to current standards could be achieved given the available site frontage.

A residential vehicular access onto St Giles Road would be acceptable in principle and would reduce the impact at Hipperholme Crossroads. The impact on the local road network to the east would need to be assessed including the junction of Wakefield Road.

The internal site would need to be permeable to pedestrian and cyclists to improve connectivity to schools and local facilities as this would reduce the need to travel by car.

Mitigation

Whilst subject to detailed assessment mitigation is likely to be required at Hipperholme Crossroads.

Conclusion (see methodology)

Developable (B)

Justification

Technical Information Required

Transport Assessment & Travel Plan, Access proposals and mitigation proposals and design. Transport Assessment to include assessment of Hipperholme crossroads.

Highways DM Comments in response to issues raised during 2017 Consultation

Summary of key Comments Made

Access

Response to Comments

Reference is made to a possible additional vehicular access through an adjacent site.

Conclusion

Highway authority view unchanged

Site Access RAG

Potential access issues which are resolvable

Impact on Local Road Network

Local Road Network RAG

Impact on the road network requiring mitigation

Ecology

West Yorkshire Ecology

SHLAA Ref

SSSI Comments

Mitigation

Conclusion

Local Wildlife Site Comments

Mitigation

Conclusion

Local Geological Site Comments

Mitigation**Conclusion****Habitats of Principal Importance Comments**

Lowland mixed deciduous woodland UK BAP Priority habitat

Mitigation Remove woodland from proposed allocation

Conclusion Remaining site likely to be acceptable.

Species of Principal Importance Comments

Woodlark

Mitigation**Conclusion****Habitat Network Comments****Mitigation****Conclusion****Conclusion**

Remove woodland from developable area

Conservation (Ecology) Comments in response to issues raised during 2017 Consultation**Summary of Key Comments Made****Response to Comments**

These comments have been informed by email exchanges with Robert Masheder of West Yorkshire Ecology Service.

The updated PEA is helpful and I believe that there is now sufficient information to consider this new proposed allocation. A recommended net gain calculation has not been carried out. However it will be helpful to inform the viability of the allocation at application.

The proposals will result in a loss of almost all the broad-leaved plantation woodland to the north of the site. This is a UK Habitat of Principal Importance, of importance to protected species and forms part of the Wildlife Habitat Network. Its loss would be counter to NPPF paragraph 170d) "minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures" and also the Tree and Woodland Strategy for Calderdale, 2017-2027 which has a target to increase the Borough's woodland cover each year to 2031.

Grassland of wildlife value is proposed to be retained but, at this stage, it is unclear whether it will be managed beneficially or used for recreation. This should be retained and enhanced if possible.

In order to prevent damage to the Wildlife Habitat Network I recommend that areas of Wildlife Habitat Network are excluded from the developable area. It should be noted that the current proposals are likely to result in a significant biodiversity net loss which will be costly to compensate for off-site.

Mitigation

Grassland of wildlife value should be retained and enhanced if possible. Wildlife Habitat Network should be excluded from the developable area.

Technical Information

An Ecological Impact Assessment should be undertaken. This should include a Net Gain assessment using the Defra biodiversity metric and be informed by the species surveys recommended within the PEA.

Conclusion

Wildlife Habitat Network should be excluded from the developable area

Ecology RAG

No impact on environmentally sensitive areas

Open Space

OS Ref

OS Typology

OS Recommendation

Safer, Cleaner, Greener Comments

Comments

Open space in the area has been analysed in accordance with the Council's standards by drawing buffers of 240m, 400m, 600m and 1200m around the site to indicate the accessibility distances for the different open space typologies. Table LP0032 summarising the sites within these buffers shows that there are no allotments or larger areas of amenity green space within the catchment of the site and there are no local play areas. The proposal includes the development of 90 dwellings and because of the deficit of open space within its catchment, on site open space should include a play area to the LEAP standard, an area for informal recreation and either an area for allotments/community garden or dwellings should have gardens of a sufficient size to enable the growing of fruit and vegetables.

Open Space RAG

No loss/No Impact

Historic Environment

Historic England

Comments

Nos. 1 and 2 Yew Trees 60 metres to the south of this area are Grade II Listed Buildings.

Suggested Change

There is a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess.

If allocated, the Plan should make it clear that development proposals for this area would need to ensure that those elements which contribute to the significance of this building are not harmed.

HIA Undertaken?

WYAAS Comments

Need for predetermination archaeological evaluation -PRN 2599 immediately adjacent

Conservation (Heritage) Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Nos. 1 and 2 Yew Trees 60 metres to the south of this area are Grade II Listed Buildings and class III archaeological site PRN 2599 is immediately adjacent to the site.

There is a requirement in the 1990 Act that "special regard" should be had to the desirability of preserving Listed Buildings or their setting or any features of special architectural or historic interest which they possess. If allocated, the Plan should make it clear that development proposals for this area would need to ensure that those elements which contribute to the significance of this building are not harmed.

The Class III archaeological site is also sited within the vicinity of Yew Trees immediately adjacent to the site. It is the possible location of a well-documented medieval settlement known as Thorpe (HER record). WYAAS recommend a predetermination archaeological evaluation.

I have no objections to the principle of mixed use site allocation here, however there does not appear to have been any consideration for heritage implications in the Planning issues raised in the draft SoCG.

This needs to be addressed to ensure that the Masterplan has undertaken sufficient assessment of any potential impact on surrounding heritage assets to ensure the development does not harm the setting of nearby heritage assets and/or has provided mitigation to minimise any harm caused.

Assessment of impact at this early stage in the proposals will ensure the optimum layout of development with any required design features incorporated within the development of the scheme rather than as an afterthought in an attempt to redress harmful impacts missed at an early stage. This will ensure the requirements of the NPPF are met and any site specific considerations incorporated as part of the plan making process as necessary.

In particular, the proposals include a vehicular access utilising the existing small access adjacent to Yew Trees, which appears to serve the listed building (and perhaps acted as a minor access/escape route from the site?).

The widening of this access and removal of the vegetation and trees from the immediate surroundings would harm the setting of the listed building. The current vegetation, whilst not of any exceptional quality, softens the landscape and provides some historic rural context to views of the listed building along St Giles Road. Furthermore, the boundary wall of the listed building, will form part of its curtilage and listed building consent would be required for its alteration or removal.

Works in this area also have the potential to affect the identified archaeological site and further investigation and measures to evaluate and record archaeology need to be considered.

Given the existing access, has thought been given to utilising this as a pedestrian and cycling focussed access rather than vehicular, and looking to incorporate a landscape led design solution, rather than a focus on the motor vehicle? This could enhance sustainable aspects of the development as well as provide potential improvements to the landscape and setting of the listed building.

In relation to the built development on the site, the high level plan indicates residential development extending to the south eastern site boundary with no indication of a landscape buffer or retention of the existing tree/hedge to provide any screening of the development from the listed building.

The setting of Yew Trees has been harmed by the existing residential development to the west. Its remaining historic rural setting as viewed from St Giles Road should not be further eroded by development at the site. Measures could include well designed and maintained landscaping to the south eastern boundary that is incorporated within the site layout and not left as a strip buffer with no amenity value; setting back built development with limited massing, scale and heights to ensure development is not visible/or dominant in views from the listed building/St Giles Road; use of existing trees alongside additional planting.

Mitigation

Historic Environmental RAG

Some impact which could be mitigated

Housing Services

Comments

Principle of Development

The development site consists of:

- LP1116 1.83ha with Outline Planning permission for up to 50 dwellings (16/01381/OUT)
- LP1648 Former Car park 0.85 ha with theoretical capacity of 31 dwellings
- LP00032 1.94 ha. allocated for employment use
- Site of former Crosslee Factory

The proposals in the Statement of Common Ground could result in the development of at least 6ha. of land for

housing with potential for over 200 dwellings including a much needed element of retirement housing. This is to be welcomed and is supported. The retirement housing should comply with Draft Local Plan Policy HS4 (or its equivalent on adoption)

The Appendix also proposes 2ha of employment plus a retail element. Given its proximity to existing and new residential development we would prefer the employment to be limited to B1 uses (if necessary protected by a Legal Agreement preventing later conversion to residential by permitted development rights).

The retail and open space proposals are acceptable but additional open space would be required within the residential development in the form of play areas, pocket plants and opportunities for community growing. The retirement housing should have its own dedicated open space.

Disposition of Development

The internal layout of the development should provide scope for it to be served by public transport by for example providing a loop road through the site so that bus services along the Brighthouse Road can be diverted to serve the site. The retail and employment uses should be served by a common access designed so that traffic serving these uses does not need to pass through the residential area.

Housing Types

Given its location close to public transport and facilities, development should be at a relatively high density, overall averaging more than 30dph (in accordance with draft Local Plan Policy HS2 or its equivalent on adoption). The Council would seek a mix of housing types, sizes and tenures to be provided on the development in accordance with Local Plan Policy HS4 (or its equivalent on adoption). Proposals for residential development should ensure that 100% of units are adaptable and accessible homes (see policy HS4). Consideration should be given to provision of bungalows on part of the site to complement the retirement housing. The Council is actively seeking opportunities for self build and custom build sites. This site would appear to be suitable and the Council would seek a minimum of 5% of homes to be in the form of serviced plots with access to a public highway; and connections to the relevant utilities such as electricity, water and waste water.

Affordable Housing

The site is located in Affordable Housing Zone C where market activity is moderate. However it is close to the "Hot" market area of Lightcliffe. In accordance with Draft Local Plan Policy HS6 (or its equivalent on adoption) at least 25% of new housing should be affordable. These should be incorporated into the development including the retirement dwellings. Because of the housing market in the Borough preference is for most affordable housing to be affordable or social rent tenure, preferably owned and managed by a Registered Provider already operating in the Borough. Affordable housing provision should extend to the retirement housing which could be developed by a local Registered Provider. The planning application for the site(s) should include details of the how the affordable housing should be provided and retained.

Implementation

Although the size of development overall is below the threshold for a masterplan in Draft Local Plan Policy IM4, there would be considerable benefit to developers and the local community in preparing and consulting on a masterplan for all the sites that are the subject of this status. This should include arrangements for phasing, affordable housing and off- and on-site contributions to infrastructure plus arrangements for management of open space and other facilities. Draft Local Plan Policy IM8 on Piecemeal Development (or its equivalent on adoption) should also be taken into account.

Housing Service Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Housing Services RAG

Positive

Employment Land Study

Site Summary

The following comments relate to LP0032 as it was assessed for the Local Plan Publication Draft and relate to when it was assessed as an Employment Site. This is a brownfield site behind the Crosslee domestic appliances factory and White Knight outlet. It houses a storm water tank underground to collect rainwater from the factory roof. It is a large, level site adjacent to existing industrial/commercial uses. However, the access would need to be agreed upon or a new access created and the storm water tank may limit the developable area, unless it can be relocated. The site should be safeguarded until highways improvements are made.

Recommendation

UDP allocated site – retain as New employment allocation

Officers Comments

Site rated as Average.

Business and Economy Services

Comments

After looking at these proposals and speaking to the agents who had the factory site on the market who advised me that the interest shown for the site was mostly for smaller units not one large potential occupier due mainly to the location I can accept this change from a current employment land and New Employment site to Mixed use as the potential for retail and/or care home will compensate for the loss of the Crosslee factory and the retention of part of the site for industrial development is welcomed.

Mitigation

Conclusion Suitable for Mixed Use including Employment.

Business and Economy Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Business and Economy RAG Positive

Minerals

Stone Mineral Safeguarding Area Within MSA Buffer

Coal Mineral Safeguarding Area Within MSA

Minerals Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Non mineral development proposals will be expected to investigate the potential for extraction of the mineral resource prior to development taking place. This is a requirement of Local Plan policy

Minerals RAG Within MSA

Environmental Health

Comments

AIR QUALITY COMMENT - Bearing in mind the proximity of the Hipperholme AQMA (No. 7) mitigation would be appropriate to address air quality impacts. Air quality and the impact of additional road traffic taken cumulatively with other local developments would need to be considered. The impact of road traffic emissions on the residential development itself would not be expected to be significant, and no breach of the air quality objectives for nitrogen dioxide and particulate matter is expected on site. **CONTAMINATED LAND** - this area may include contaminated land. **NOISE COMMENT** - consideration should be given to the impact of noise from industrial and commercial development upon the residential properties in the area, particularly those close to the western boundary of the site.

AIR QUALITY MITIGATION - West Yorkshire Low Emission Strategy has been adopted by the Council. This gives guidance on good practice for mitigating air quality impacts. **CONTAMINATED LAND MITIGATION** - any development should be accompanied by an appropriate contaminated land assessment, with any mitigation measures identified. **NOISE MITIGATION** - noise impact assessment prior to development, to include the impact of industrial/commercial noise upon residential amenity.

Minerals Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Mitigation

Environmental Health RAG

There is no significant detrimental effect that cannot be mitigated against

Other Factors

Physical Constraints RAG

Relatively flat

Agricultural Land Classification RAG

Lies within 4 or 5 (and urban)

Logical Settlement Boundary RAG

Within settlement or edged on 3 sides

Landscape Character Assessment

Landscape Character Type K – Coalfield Edge Urban Edge Farmland

Landscape Character Area K1: Thornton - Queensbury

Special Landscape Area Outside SLA

Landscape RAG

No significant harm on the landscape

Other Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Additional Comments in Response to Issues Raised During 2017 Consultation

Summary of Key Comments Made

Response to Comments

Accessibility

Distance to Bus Stop Less than 400m

Distance to Rail Station More than 2km

Distance to Publicly Accessible Open Space Between 600m and 2km

Journey time to Town Centre Less than 15 mins

Journey time to Shops Selling Day to Day Goods Less than 15 mins

Journey time to Hospital Between 30 and 60 mins

Journey time to General Practitioner Less than 15 mins

Distance to Primary School Less than 15 mins

Journey time to Secondary School Less than 20 mins

Journey time to Further or Higher Education Between 30 and 60 mins

Journey time to Primary Employment Sites Less than 20 mins

Accessibility Comments in Response to Issues Raised During 2017 Consultation

Accessibility Comments Following LPID

Response to Comments

Deliverability

Developable Area (ha)	8.56	Dwellings per Hectare	21	Residential Capacity	180
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Deliverability Comments in Response to Issues Raised During 2017 Consultation

Deliverability Comments Following LPID

Response to Comments

Site Summary

Overall Assessment Summary

This is a flat, mixed brownfield/greenfield site at the former Crosslee factory. It lies within the existing urban area, and is adjacent to employment uses, and residential. The site is allocated in the RCUDP as New Employment Site and designated a wildlife corridor and Primary Employment Area.

Whilst the site was originally submitted for employment use in 2008, and subsequently confirmed, a submission received during the last consultation indicates that the owner's intention is for a Mixed use development which it has been assessed for as part of this report.

The site is fairly accessible, being close to shops, education and health facilities, however it is more than 2km to the nearest railway station.

The site is situated within Flood Zone 1, and no previous land drainage issues have been reported. The Council's Flooding and Drainage section considers it is suitable for development subject to evaluation of the existing drainage network and the provision of SuDS.

Highways England state that development would cause no significant impact on the Strategic Road network.

Highways Development Management consider the site would be developable subject to the access being upgraded to adoptable standards which would be achievable given the available frontage. The site could be accessed from existing access road off A644 which currently provides access to Crosslee. A residential vehicular access onto St Giles Road would be acceptable in principle and would reduce the impact at Hipperholme Crossroads. The impact on the local road network to the east would need to be assessed including the junction of Wakefield Road. In relation to the local road network, a proposed carehome would generate low levels of traffic in peak periods, the other proposed used would likely generate higher levels of traffic than the former use. Whilst subject to assessment, mitigation is likely to be required at Hipperholme Crossroads.

Development would have a potential impact on the Lowland mixed deciduous woodland which is a UK BAP Priority Habitat. Therefore, West Yorkshire Ecology recommends the removal of this woodland from the developable area. This is supported by the Council's Ecology Officer who recommends that the Wildlife Habitat Network is excluded from the developable area. The developer has produced a Primary Ecological Appraisal, however this needs to include net gain calculations at Planning Application stage. The proposals as it is now would result in a loss of almost all the broadleaved plantation woodland which counters NPPF paragraph 170d. Therefore, the removal of the areas indicated on the Indicative Developable Area map would prevent damage to the Wildlife Habitat Network. Further evidence should be provided at Planning Application to demonstrate the extent of the ecological value of the site. Any change to the developable area will need to be justified by ecological evidence.

An Open Space assessment has been undertaken which demonstrates that there are no allotments or larger areas of amenity green space within the catchment of the site and there are no local play areas. Therefore due to the deficit of open space within its catchment, on site open space should include a play area to the LEAP standard, an area for informal recreation and either an area for allotments/community garden or dwellings should have gardens of a sufficient size to enable the growing of fruit and vegetables.

The site is within 400m of a historic park and Nos. 1 and 2 Yew Trees are 60 metres to the south of this area which are Grade II Listed Buildings, so any development will need to ensure compliance with Local Plan policies which seek to protect and enhance heritage assets; whilst West Yorkshire Archaeology Advisory Service states there would be a need for predetermination archaeological evaluation of an adjacent asset.

Housing Services support the allocation for a mix of uses including affordable homes in line with the Local Plan Policies. However Housing Services have some concerns regarding the layout of the masterplan including the care facility being adjacent to a busy road.

The Employment Land Study originally assessed the Employment site as 'Average' and although it suggested that the site be safeguarded for long term employment in the Publication Draft of the Plan, Employment Services supports a mixed use allocation as the potential for retail and/or care home will compensate for the loss of the Crosslee factory and the retention of part of the site for industrial development is welcomed.

The site is within the Minerals Safeguarding Area for Coal, and within the buffer MSA for Stone. Non mineral development proposals will be expected to investigate the potential for extraction of the mineral resource prior to development taking place. This is a requirement of Local Plan policy.

Environmental Health consider that mitigation would be appropriate to address air quality impacts due to proximity of the Hipperholme AQMA (No. 7) Due to the mixed use nature of the proposed uses, any new employment use would need to take into account the proximity of the residential development which is enforced by Environmental Health's comments that layout and design would be crucial. The site may contain contaminated land, any development should be accompanied by an appropriate contaminated land assessment, with any mitigation measures identified.

The site is in one ownership and the owner has confirmed that the site is available for development.

The Council proposes this site is allocated for a Mixed Use site. The Council generally supports the mix of uses on the site which was endorsed in the Mixed Use Capacity study for the following uses: land for C3 retirement home, 1,801m² retail, 8,000m² B use, however in terms of residential, the developer proposes an indicative capacity of 220 dwellings (including the care/retirement facility) whereas due to the reduction of the developable area to the north and east to reflect ecology constraints the Council recommends an indicative capacity of 182 dwellings. This is based on 1ha of residential land being removed which equates to 38 dwellings (based on the housing density multipliers).

Additional Site Commentary

Outcome

Mixed Use Site

Appendix 2 – Sustainability Appraisal

Sustainability Appraisal Report

LP Site Ref	LP0032	Site Area	10.90	Eastings	412858
				Northings	425042
Property Name/Number	Crosslee PLC				
Road/Street Name	Brighthouse Road				
Locality	Hipperholme				
Town	Brighthouse				
Postcode	HX3 8DE				
Draft Plan Proposed Use	Mixed Use Site				
Settlement_Hierarchy	1415				
Local_Plan_Area	Brighthouse				
Ward	Hipperholme and Lightcliffe Ward				

Site Assessment Summary

OBJECTIVE 1

Summary **Uncertain**

TO ENSURE QUALITY HOUSING IS AVAILABLE TO EVERYONE

Overall impact is uncertain as it will be dependent on the residential element of the mixed use development.

OBJECTIVE 2

Summary **Positive**

TO IMPROVE SAFETY AND SECURITY FOR PEOPLE AND PROPERTY

The site is predominately derelict, brownfield/greenfield site, as such development would have a positive impact on this SA Objective.

OBJECTIVE 3

Summary **Positive**

TO CREATE AND RETAIN HEALTHY VIBRANT AND INCLUSIVE COMMUNITIES

Overall the impact is positive as the site is considered to be in an accessible location close to Hipperholme District Centre. It is within 600m of a Public Open Space and meets the access criteria for GP Surgeries. However there are Hot Food Takeaways within 400m of the site.

OBJECTIVE 4

Summary **Uncertain**

TO ENCOURAGE INCREASED PARTICIPATION IN CULTURAL, LEISURE, AND RECREATION ACTIVITIES

The overall impact on the SA Objective is uncertain as although the site meets the Access to Natural Greenspace Standards requirements and scores positively in terms of access to cultural, leisure and recreation facilities, the remaining questions record uncertain results.

OBJECTIVE 5

Summary **Positive**

TO IMPROVE ACCESSIBILITY TO ESSENTIAL SERVICES, FACILITIES AND EMPLOYMENT

Overall the site is considered as having a potentially positive impact on the SA Objective, as it meets the majority

of accessibility criteria, although there is a negative impact in relation to the distance to a train station, and uncertainties concerning the demand for existing services and access to services for those with the greatest needs.

OBJECTIVE 6

Summary **Uncertain**

TO RETAIN, PROTECT AND CREATE A QUALITY, LOCALLY DISTINCTIVE BUILT AND HISTORIC ENVIRONMENT

Overall the impact is uncertain due to potential impact from development on a listed building that is adjacent to the site. Although the site is greenfield/brownfield mix, the use of the derelict land will improve the quality of the area.

OBJECTIVE 7

Summary **Uncertain**

TO REDUCE THE RISK OF FLOODING AND RESULTING DETRIMENTAL EFFECTS ON PEOPLE AND PROPERTY

This is a brownfield/greenfield site but is outside of any identified flood risk zones. Therefore the uncertainty arises from potential increased run-off rates resulting from development of greenfield areas of the site.

OBJECTIVE 8

Summary **Uncertain**

TO REDUCE THE EFFECT OF TRAFFIC ON THE ENVIRONMENT

Although the site is within a 0-15 minute public transport journey of a town centre, development of the site is likely to result in an increase in traffic and therefore the overall impact on this SA Objective is uncertain.

OBJECTIVE 9

Summary **Positive**

TO PROTECT AND ENHANCE BIODIVERSITY AND GEODIVERSITY

The site is in excess of 7km from a SPA /SAC; and is over 800m from a SSSI and a LWS. The site however, lies within an area where priority habitats and or species are at a potential medium vulnerability to Climate Change and contains parts of the Calderdale Wildlife Habitat Network, however these areas are excluded from the developable area. Overall, the site records a positive impact against the SA Objective.

OBJECTIVE 10

Summary **Uncertain**

TO REDUCE POLLUTION LEVELS AND CO2 EMISSIONS TO TARGET LEVELS

Although new development would be required to meet certain energy efficiency standards, the site if developed, would have an uncertain impact on the AQMA at Hipperholme, as well as uncertainty in relation to the levels of renewable and low carbon energy generation.

OBJECTIVE 11

Summary **Positive**

TO PROTECT AND ENHANCE THE NATURAL, SEMI NATURAL AND MAN MADE LANDSCAPE

The site lies within the urban area and reuses an vacant employment site and therefore a positive impact is recorded against this SA Objective. The only uncertain impacts relate to the woodland which is within the site boundary but excluded from the developable area.

OBJECTIVE 12

Summary **Uncertain**

TO ENSURE PRUDENT AND EFFICIENT USE OF NATURAL RESOURCES AND ENERGY

Although new development will be required to meet certain energy efficiency requirements, the overall impact is uncertain as it will be dependent on the materials used to construct any future development, as well as the subsequent energy demand.

OBJECTIVE 13

Summary **Positive**

TO ENSURE EFFICIENT USE OF LAND

The site is more than 50% brownfield, therefore it will have a positive impact using this site. The land is identified as having potential contamination issues, and development would therefore offer potential remediate potentially contaminated land. The site is also within the urban area and is proposing a mix of uses including employment. The overall impact for this Objective is therefore positive.

OBJECTIVE 14

Summary **Uncertain**

TO REDUCE THE AMOUNT OF WASTE PRODUCED

Overall the impact is uncertain for this SA Objective, although the policies in the Local Plan would provide a framework to manage waste sustainably.

OBJECTIVE 15

Summary **Positive**

TO PROVIDE GOOD EMPLOYMENT OPPORTUNITIES FOR ALL

A potential positive impact is recorded against this SA Objective as the site is proposing a mix of uses and is within a Lower Super Output Area (LSOA) ranked in the 5th decile of the Index of Multiple Deprivation (employment data -where 1st decile is the most deprived and 10th is the least deprived). Therefore the site is within an area of average unemployment levels, which could be improved by additional employment opportunities.

OBJECTIVE 16

Summary **Uncertain**

TO ACHIEVE BUSINESS SUCCESS, SUSTAINABLE ECONOMIC GROWTH, AND CONTINUED INVESTMENT

The site could offer potential for new modern business units as well as retail, and attract inward investment. In addition, new buildings could improve the energy and carbon efficiency of businesses and the economy. The overall impact therefore is uncertain given there is a mix of uses and will be determined by the final proposal.

OBJECTIVE 17

Summary **Uncertain**

ENHANCE THE VIABILITY AND VITALITY OF THE TOWN CENTRES

The overall impact on retailers from a mixed use development is uncertain.

OVERALL SUMMARY

Overall the site records a positive impact against seven of the SA Objectives. The site's accessible location results in a positive impact on both SA3 - creating and retaining healthy, vibrant and inclusive communities and SA5 - improving accessibility to essential services, facilities and employment. The site is in excess of 7km from a SPA /SAC and is over 800m from a SSSI and a LWS. However, the site lies within an area where priority habitats and or species are at a potential medium vulnerability to Climate Change, and contains some areas of Calderdale Wildlife Habitat Network, however these are removed from the developable area. Overall, the site records a positive impact against SA9 - the protection and enhancement of bio and geo diversity. Due to the site's location in the urban area and the reuse of an vacant employment site, the site is considered to have a potentially positive impact on SA 11 - protection and enhancement of the landscape, the only uncertain impacts relate to the elements concerning the adjacent woodland.

A positive impact is recorded against SA13 - the efficient use of land, as more than 50% of the site is brownfield, the land is identified as having potential contamination issues, and development would therefore offer a potential opportunity to remediate potentially contaminated land. Finally, the site scores positively against SA15 – providing good employment opportunities for all by offering modern employment space using a vacant piece of land within a Lower Super Output Area (LSOA)with an average rate of unemployment.

The remaining impacts are considered uncertain. Issues to note include SA7 and flood risk, as although the site is outside of any identified flood risk zones there is uncertainty relating to the potential increased run-off rates resulting in any development of greenfield areas. The overall impact on SA4 and encouraging increased participation in cultural, leisure and recreation is uncertain as although the site meets the Access to Natural

Greenspace Standards requirements and is in an accessible location, the site is part greenfield and the access to Public Open Space is uncertain. In relation to SA10 and reducing pollution levels and Co2 emissions, although new development would be required to meet certain energy efficiency standards, the site if developed, would have an uncertain impact on the AQMA at Hipperholme, as well as uncertainty in relation to the levels of renewable and low carbon energy generation.

MITIGATION

Due to some of the site's greenfield status, and the resulting potential to increase run-off, mitigation could be secured by applying green and blue Infrastructure on site such as SuDS and green roofs to reduce the infiltration rate of precipitation as well as provide storage for storm water run-off. In addition, mitigation measures may be required in relation to the Wildlife Habitat Network, and the potential impact of Climate Change on priority habitats.