

# **CALDERDALE LOCAL PLAN**

## **OPEN SPACE QUANTITATIVE STANDARDS AND ASSESSMENT OF PROPOSED ALLOCATIONS**

**Calderdale Metropolitan Borough Council**

**26 February 2021**



## **OPEN SPACE QUANTITATIVE STANDARDS AND ASSESSMENT OF PROPOSED ALLOCATIONS**

The production of this paper has been necessitated following the Stage 2 hearing sessions of the Examination into the Calderdale Local Plan held between 6th October and 4th December 2020. During these sessions, the Inspector questioned whether there was sufficient assessment evidence to justify the allocation of a number of sites that involve open space deletion or compensatory provision. Specifically, the Inspector raised issue regarding the absence of quantitative standards of open space and the lack of evidence demonstrating that each relevant allocation had been assessed against them and could be considered to comply with Paragraph 74 of the NPPF (2012). As a result, the Council has agreed to establish a set of Open Space Quantitative Standards and undertake assessment of the following sites which are proposed for allocation in the Local Plan against these standards:

LP0103 – Land at Horley Green Road, Claremount, Halifax.

LP0261, LP0523, LP1368 - Land at Turner Avenue South and Land at Furness Avenue, Ovenden.

LP0452 – Land at Ovenden Green, Ovenden, Halifax.

LP0548 – Land at junction of Granny Hall Lane and Blackburn Road, Brighouse.

LP0901– Land off Woodlands Avenue, Todmorden.

LP0931 – Land at Greave House Field, Luddenden Foot.

LP0968 – Land at West End Golf Club, Paddock Lane, Halifax.

LP1000 – Land off Woodhouse Lane, Rastrick.

LP1033 – Land off Toothill Bank, Rastrick.

LP1041 – Land at West Street and Halifax Road, Shelf.

LP1060 – Land at Shirley Grove, Lightcliffe.

LP1356 – Hollins Park, Cemetery Lane, Sowerby Bridge.

LP1379 – Heathmoor Park Road/Field Head Lane, Illingworth.

LP1398 – Land on the west side of Brockwell Lane, Triangle, Sowerby Bridge.

LP1429 and LP1481 – Former St. Catherines High School, Holdsworth Road, Holmfild.

LP1451 – Garden Suburbs: Woodhouse, Brighouse.

LP1463 – Garden Suburbs: Thornhills, Brighouse.

LP1486, LP1487, LP1488 and LP1489 – Land off Hambleton Drive/Hambleton Crescent/Balkrum Road, Mixenden.

LP1547 – Land at Abbey Park, Illingworth.

LP1654 – Politt Fields, 8 Ripon House, Sowerby Bridge

## Calderdale Quantity Standards for Open Space

Table 1: Calderdale Quantity Standards for Open Space

		ha/1000population							Calderdale		
		Kirklees 2015	Leeds 2011	Oldham 2010	York 2014	Fields in Trust		Natural England	Notes	Current Provision	Proposed Standard
	Sites 0.2 or above					Reflect the findings of local standards for open space applied by local planning authorities.			Sites 0.04ha or above		
<b>Parks and Gardens</b>	Parks and recreation grounds	0.8	1	0.26	0.18		0.8			0.93	0.8
<b>Amenity Green Space</b>	Not recreation grounds	0.3	0.45	0.46	1.45	Informal recreation spaces	0.6		informal recreation spaces and housing green spaces	0.68	0.6
<b>Children's Play</b>	No quantity standard		0.32 fixed play	0.37 children	0.48 children		0.25				
			0.6 amenity/informal buffer area	0.1 young people	0.21 young people						
<b>Allotments</b>	This is the NAS standard	0.5ha/1000 households	0.24	no standard	0.29						
<b>Natural Greenspace</b>		2	2	1.95	2.13		1.8	2	Excludes private land with no access and moorland outside the urban area	4.26	2

The above table shows the quantity standards for open space which have been adopted by a number of neighbouring local authorities and by Fields in Trust and Natural England. The current provision in Calderdale is also shown for parks and gardens, amenity green space and natural/semi-natural green space.

Local authorities have taken differing approaches to classifying open space therefore it is difficult to make a direct comparison. However, looking at these standards together with the current provision in Calderdale, it is proposed to adopt the standards recommended by Fields in Trust for parks and gardens and amenity green space and Natural England's standard for natural green space. It is proposed to retain the current LAP, LEAP and NEAP standards for children's play.

## **RESULTS**

### **Assessment of Local Plan Allocations against Quantity Standards for Open Space**

Table 2 below provides a summary of the results from the assessment of relevant Local Plan Allocations against quantity standards for Open Space. The sites assessed are those that the Inspector specifically raised issue with during the Stage 2 Hearings regarding the absence of quantitative standards of open space and the lack of evidence demonstrating that each relevant allocation had been assessed against them. Calderdale Quantity Standards for Open Space are set out in Table 1 of this paper. The Open Space Quantitative Site Assessment Forms for each site assessed can be found in Appendix 1 of this paper.

Table 2: Assessment of Local Plan Allocations against Quantity Standards for Open Space

<b>Local Plan Allocation</b>	<b>Original Recommendation</b>	<b>Quantitative Assessment</b>	<b>Revised Recommendation</b>	<b>Sensitivity Test: Revisions to Council Recommendation</b>	<b>Allocation to proceed</b>
LP0103	Development proposals should include either the creation of allotments on part of the site or the quality of Horley Green Recreation Ground should be enhanced.	Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area, and of natural/semi-natural greenspace in the Halifax area.	Development proposals should include either the creation of allotments on part of the site or the quality of Horley Green Recreation Ground should be enhanced. If local demand was for a different type of open space for example a kick-about area then that could be created rather than allotments.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP0261, LP0523 & LP1368	Consider provision of public open space required as part of development of this site and adjacent site. Provision of public open space required as part of development of this site and adjacent Site.	Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area, and of natural/semi-natural greenspace in all areas.	Development proposals for the three sites should include a local park with children's play facilities.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP0452	Development proposals should include the provision of a community garden/allotment and a small local play area.	Compared to the Calderdale standard there are deficits of parks and gardens in the Halifax area and of natural/semi-natural greenspace in the 400m and 1200m catchments and in the Halifax area.	Development proposals should include the provision of a community garden/allotment or kick about area depending on local demand and a small local play area.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y

LP0548	Compensatory Open Space provision not required.	There is a deficit of amenity green space within the 600m and 1200m catchment areas. In addition there are deficits of parks and gardens and natural/semi-natural greenspace within some of the catchment areas.	Improvements to other open space in the area should be carried out prior to development. These could include facility improvements at the adjacent Lane Head Recreation Ground.	Site Specific Condition should be added to Appendix 1 to ensure revised recommendation is implemented.	Y
LP0901	Provision of improved play area and flat kick about area on the adjacent site (LP0902).	There are deficits of parks and gardens in the 400m and 600m catchments, amenity green space in all catchment areas and natural/semi-natural green space in the 400m catchment.	Development proposals should include replacement of the play area and kick about area. If this was to be on the adjacent site LP0902, the replacement kick-about area is likely to be smaller than the existing one due to the undulating ground therefore the quality of the playing surface should allow greater usage. The community orchard is on the embankment adjacent to Woodlands Avenue and it would be preferable if this was retained since the trees are well established and it would be impractical to relocate them. A play area of equivalent quality and quantity could be accommodated on LP0902 however construction costs are likely to be higher than if the site was flat. Pedestrian access to LP0902 should be provided	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y

			<p>through LP0901 to minimise the impact of moving the facilities and the site should be accessible for prams.</p> <p>Habitat improvements should be included within LP902 to compensate for the conversion of part of the natural/semi-natural open space to more formal recreational use.</p>		
LP0931	Development proposals should include on-site replacement amenity green space.	Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchment areas and in the Mytholmroyd area. Amenity greenspace and natural/semi-natural greenspace are well provided for.	High quality open space should be provided on site as part of any development to compensate for the open space loss. Alternatively other open space in the area should be enhanced, for example Holmes Park, Kershaw Estate, Midgley Recreation Ground or Luddenden Recreation Ground.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP0968	Development proposals should include improvements to open space facilities in the immediate locality.	There are deficits of parks and gardens and of natural/semi-natural greenspace in all areas.	Development proposals should consider improvements to open space facilities in the immediate locality for example at Roils Head playing Fields.	No change required to Appendix 1 Site Specific Conditions.	Y
LP1000	Compensatory Open Space provision not required.	Compared to the Calderdale standard there are deficits of parks and gardens in all catchment areas and of amenity green space in the 600m and 1200m catchments.	Development proposals should include the enhancement of other open spaces in the area such as at the adjacent Woodhouse Recreation Ground.	Site Specific Condition should be added to Appendix 1 to ensure revised recommendation is implemented.	Y

LP1033	Compensatory Open Space provision not required.	There are deficits of parks and gardens in all catchment areas and natural/semi-natural greenspace within the 400m and 600m catchment areas.	Improvements to other open space in the area should be carried out prior to development, for example at the adjacent Carr Green Recreation Ground and Playing Fields.	Site Specific Condition should be added to Appendix 1 to ensure revised recommendation is implemented.	Y
LP1041	Any development should include an area of good quality, accessible amenity open space and improved access to the woodland.	There are deficits of parks and gardens in the 400m, of amenity green space in all areas and of natural/semi-natural greenspace in the 400m and 600m catchments.	Development proposals should include the retention and enhancement of open space within the site and/or the improvement of other open space in the area such as at Shelf Hall Park.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP1060	Improvements to other open spaces in the vicinity such as Bentley Avenue and Aysgarth Avenue.	There is a deficit of parks and gardens in the 400m and 600m catchments and within the Brighouse area. In addition there is a deficit of natural/semi-natural greenspace in the 400m, 600m and 1200m catchment areas.	Improvements to other open space in the area should be carried out prior to development. These could include additional equipment at the nearby play area at Bentley Avenue and the provision of goal posts on the grassed area at Aysgarth Avenue.	No change required to Appendix 1 Site Specific Conditions.	Y
LP1356	Re-provision of equivalent or better quantity or quality pitches would be required.	Compared to the Calderdale standard there are deficits of parks and gardens in all areas, of amenity green space in the 400m, 600m and 1200m catchments and of natural/semi-natural greenspace in the 600m and 1200m catchments.	In addition to the re-provision of pitches, improvements to other open space in the area should be carried out prior to development. These could include facility improvements at the Hollins Mill Leisure Park.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y

LP1379	Consideration of the need for open space in the local area, and the impact on visual amenity currently provided by the site.	Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area. There is a deficit of natural/semi-natural greenspace in the Halifax area.	Development proposals should include either the provision of open space as part of the development or the enhancement of other open spaces in the area.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP1398	Mitigation against loss of open space, for example, enhancing existing areas of natural open space or providing new facilities.	Compared to the Calderdale standard there are deficits of parks and gardens in all catchment areas, amenity greenspace in the Sowerby Bridge area and natural/semi-natural greenspace in the 400m and 600m catchments.	High quality open space facilities should be provided on site as part of any development to help rectify current deficiencies.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP1429 & LP1481	Development proposals should consider improvements to open space facilities in the immediate locality to include the enhancement of facilities at Beechwood Park or Holmfield Park.	Compared to the Calderdale standard there are deficits of parks and gardens in the Halifax area, of amenity green space within the 400m and 600m catchment areas and of natural/semi-natural greenspace in all areas.	In order to comply with paragraph 74 of the NPPF development proposals should consider improvements to open space facilities in the immediate locality to include the enhancement of facilities at Beechwood Park or Holmfield Park.	No change required to Appendix 1 Site Specific Conditions.	Y
LP1451	Inclusion of Open Space.	Compared to the Calderdale standard there are deficits of parks and gardens in all areas, of amenity green space in the 400m catchment and of natural/semi-natural greenspace in the 600m catchment.	In order to comply with Calderdale's open space standards development proposals should include the provision of on-site open space to the quantitative standards.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y

LP1463	Inclusion of Open Space.	Compared to the Calderdale standard there are deficits of parks and gardens in the Brighouse area, of amenity green space in the 400m catchment and of natural/semi-natural greenspace in the 600m and 1200m catchments catchment.	In order to comply with Calderdale's open space standards development proposals should include the provision of on-site open space to the quantitative standards.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP1486, LP1487, LP1488 & LP1489	Consideration of cumulative impact on provision of children's play and improvements to existing open space in the locality.	Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area, of amenity green space in the 400m catchment and of natural/semi-natural greenspace in the Halifax area.	Due to the shortage of amenity recreational space in the area, the preferred option is to retain some amenity green space within Hambleton Estate for recreational use which should be of a sufficient size to cater for residents from the proposed developments. There should be a requirement for facilities on the retained open space to be enhanced as part of any development.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
LP1547	Consideration of enhancement of other open spaces in the vicinity.	Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area and of natural/semi-natural greenspace in the Halifax area.	Development proposals should include the enhancement of other open spaces in the area such as Natty Lane Recreation Ground.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y

LP1654	Open space should be included within development proposals to mitigate any loss.	Compared to the Calderdale standard there are deficits of parks and gardens in all catchment areas, and natural/semi-natural greenspace in the 400m, 600m and 1200m catchments.	Improvements to other open space in the area should be carried out prior to development. These could include facility improvements at Beech Recreation Ground or Crow Wood Park.	Minor wording change required to Appendix 1 Site Specific Conditions to ensure revised recommendation is implemented.	Y
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## **Conclusions**

When assessing the selected Local Plan Allocations against Quantity Standards for Open Space in Calderdale it can be seen that whilst there are a number of minor changes to the consultee recommendations regarding the provision of compensatory open space, none of the revised recommendations prevent the sites being allocated and each site assessed is considered to comply with paragraph 74 of the NPPF (2012). Where revised recommendations have been made with regard to compensatory open space provision, it is proposed that either minor wording changes are made to existing Site Specific Conditions in Appendix 1 or that Site Specific Conditions are added to Appendix 1 where previous compensatory provision was not required.

**APPENDIX 1: OPEN SPACE QUANTITATIVE SITE ASSESSMENT FORMS**

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP0103

**Site Address**

Land at Horley Green Road,  
Claremount

**Stage 2 Hearing Reference**

Matter 18 Item 10:  
Loss of open space

### Relevant MIQ Question and Response

**a) Is the proposal justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value does the open space have, and where is this evidenced?**

18.7 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.8 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, as shown on map LP0103. Table LP0103 summarising the sites within these buffers shows that LP0103 is the only amenity green space over 1ha in the area. The nearby Horley Green Recreation Ground is a smaller amenity green space which was assessed as high value but low quality in the Open Space Study. There are no allotments in the area. If the site is developed then either allotments should be created on part of the site or the quality of Horley Green Recreation Ground enhanced.

**18.11 Proposed Modifications: Appendix 1 Site Specific Considerations:**  
Development proposals should include either the creation of allotments on part of the site or the quality of Horley Green Recreation Ground should be enhanced.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	0.041	0.784	3.962	0.584	0.8
<b>Amenity greenspace</b>	0.851	2.461	1.079	1.745	0.6
<b>Natural/semi-natural greenspace</b>	5.156	11.951	4.542	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area, and of natural/semi-natural greenspace in the Halifax area.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF development proposals should include either the creation of allotments on part of the site or the quality of Horley Green Recreation Ground should be enhanced. If local demand was for a different type of open space for example a kick-about area then that could be created rather than allotments.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP0261, LP0523, LP1368

**Site Address**

Land at Turner Avenue South and  
Land at Furness Avenue, Ovenden

**Stage 2 Hearing Reference**

Matter 18 Item 11:  
Loss of open space and sports  
facilities

### Relevant MIQ Question and Response

**a) Is housing development on these sites justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value do the areas of open space and the sport facility have, and where is this evidenced? Where is re-provision of facilities planned, and is the Council intending to take a coordinated approach linked to the three allocations?**

18.15 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.16 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, as shown on map LP0261. Table LP0261 summarising the sites within these buffers shows that there are several gaps in provision in the area including parks and gardens, allotments and children's play facilities.

Development proposals of these three sites should include a local park with children's play facilities. No formal sports facilities are shown at the site in either the 2012 or 2017 Playing Pitch strategy.

18.17 In terms of biodiversity, all three of these sites have low biodiversity value. LP0523 is rough species poor, neutral grassland. LP1368 is largely hard surfaced with minimal biodiversity value. LP0261 is largely short sward of limited biodiversity value with the exception of the land to the north of Furness Gardens. This supports hawthorn hedgerows and standard trees around the margins surrounding and rough pasture. The hedgerows are UK Biodiversity Habitats of Principal Importance and the standard trees should be retained. The main biodiversity value in this area lies in the Calderdale Wildlife Habitat Network to the west of Furness Drive.

18.18 Whilst Appendix 1 of the Local Plan contains a Site Specific Consideration which requires the provision of public open space as part of any development proposal (LP0261 & LP1368) a further Site Specific consideration should be added to LP0261 ensuring that the hedgerows and standard trees to the north of Furness Gardens are retained. This should be proposed as a minor modification to the site specific considerations to ensure that the proposal complies with paragraph 74 of the NPPF (2012).

18.19 **Proposed Modification:**

**Appendix 1**

**Site Specific Considerations:**

*Development proposals should retain the hedgerows and standard trees located to the north of Furness Gardens.*

18.20 Map LP0261 and Table LP0261 can be found in Matter 18 Appendix 1 at the end of this hearing statement.

**Quantitative Assessment**

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	0.000	0.000	1.191	0.584	0.8
<b>Amenity greenspace</b>	2.174	2.920	2.009	1.745	0.6
<b>Natural/semi-natural greenspace</b>	0.000	0.421	1.183	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area, and of natural/semi-natural greenspace in all areas.

**Revised Recommendation to Include Quantitative Assessment**

In order to comply with paragraph 74 of the NPPF development proposals for these three sites should include a local park with children's play facilities.

**Site Ref**

LP0452

**Site Address**Land at Ovenden Green, Ovenden,  
Halifax.**Stage 2 Hearing Reference**Matter 18 Item 14:  
Loss of open space**Relevant MIQ Question and Response****a) Is the proposal justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value does the open space have, and where is this evidenced? Should its loss be mitigated?**

18.37 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.38 Site not included in the OS study Not in 2006 OS study since the site had only recently been grassed over following housing clearance and it was not picked up in the 2015 refresh 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, as shown on map LP0452. Table LP0452 summarising the sites within these buffers shows that open space within the catchment of the site meets the Council's standards expect for allotments where there are no sites and there are no play areas to the LEAP standard within the 250m catchment. If the site is developed a community garden/allotment and a small local play area should be included in the scheme.

18.39 In terms of biodiversity, this site consists of species poor neutral grassland. The land to the south of Ovenden Green is short mown amenity grass, whilst that to the north is unmanaged coarse grass which will provide some, limited opportunities for invertebrates.

18.40 Appendix 1 of the Local Plan does not currently contain a requirement for development proposals at this site to include a community garden/allotment and a small local play area. This should be proposed as a minor modification to the site specific considerations to ensure that the proposal complies with paragraph 74 of the NPPF (2012).

**18.41 Proposed Modifications:**

**Appendix 1**

**Site Specific Considerations:**

*Development proposals should include the provision of a community garden/allotment and a small local play area.*

18.42 Map LP0452 and Table LP0452 can be found in Matter 18 Appendix 1 at the end of this hearing state

**Quantitative Assessment**

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	2.081	1.278	0.655	0.584	0.8
<b>Amenity greenspace</b>	0.695	1.226	1.167	1.745	0.6
<b>Natural/semi-natural greenspace</b>	0.425	2.979	1.022	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the Halifax area and of natural/semi-natural greenspace in the 400m and 1200m catchments and in the Halifax area.

**Revised Recommendation to Include Quantitative Assessment**

In order to comply with paragraph 74 of the NPPF development proposals should include the provision of a community garden/allotment or kick about area depending on local demand and a small local play area.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP0548

**Site Address**

Land at junction of Granny Hall Lane  
and Blackburn Road, Brighouse

**Stage 2 Hearing Reference**

Matter 16 Item 2:  
Open space: quantitative evidence  
and compliance with paragraph 74

### Relevant MIQ Question and Response

**a) Is the proposal justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value does the facility have, and where is this evidenced?**

16.3 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

16.4 This is amenity green space site 948. 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, as shown on map LP0548. Table LP0548 summarising the sites within these buffers shows that there are sufficient alternative sites of the same typology to meet the Council's adopted standards. This includes Lane Head Recreation Ground which is within the 400m catchment.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Brighouse area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Brighouse	
<b>Parks and gardens</b>	0.065	0.033	1.770	0.757	0.8
<b>Amenity greenspace</b>	1.012	0.550	0.367	0.974	0.6
<b>Natural/semi-natural greenspace</b>	0.000	0.629	1.284	2.945	2

There is a deficit of amenity green space within the 600m and 1200m catchment areas. In addition there are deficits of parks and gardens and natural/semi-natural greenspace within some of the catchment areas.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF improvements to other open space in the area should be carried out prior to development. These could include facility improvements at the adjacent Lane Head Recreation Ground.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP0901

**Site Address**

Land off Woodlands Avenue,  
Todmorden

**Stage 2 Hearing Reference**

Matter 18 Item 3:  
Current use of the land and  
proposed re-provision

### Relevant MIQ Question and Response

**a) Is a replacement kick-about area and play area of equivalent quantity and quality capable of being accommodated on the adjoining site (LP0902), taking account of its topography and vegetation? Would the community orchard also need to be relocated? Is the adjoining site easily accessed and its location conducive to users? Would the proposal accord with paragraph 74 in the NPPF? Is site LP0902 available/secured for this purpose?**

21.27 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

21.28 This guidance is repeated in paragraph 97 of the 2019 NPPF.

21.29 LP0902 is an undulating site therefore the replacement kick-about area is likely to be smaller than the existing one. The community orchard is on the embankment adjacent to Woodlands Avenue and it would be preferable if this was retained since the trees are well established and it would be impractical to relocate them.

There would be space on LP0902 to plant replacement trees. A play area of equivalent quality and quantity could be accommodated on LP0902 however construction costs are likely to be higher than if the site was flat. Pedestrian access to LP0902 should be provided through LP0901 to minimise the impact of moving the facilities and the site should be accessible for prams.

21.30 Site LP0902 is owned by the Council recent use let as a grazing site and is considered to be available for the provision of compensatory open space. The site specific considerations in Appendix 1 of the Local Plan make provision for these compensations and also open space protections. As such, the proposal is considered to accord with paragraph 74 of the NPPF (2012).

21.31 Please note that site LP0901 has recently been listed as an Asset of Community Value. Whilst this is a material consideration in the determination of a planning application, it should not prevent the site being allocated or planning permission being granted given the provision of compensatory open space and the retention of the community orchard.

21.32 Map LP0901 and Table LP0901 can be found in Matter 21 Appendix 1 at the end of this hearing statement.

### Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Todmorden	
<b>Parks and gardens</b>	0.026	0.026	3.550	1.931	0.8
<b>Amenity greenspace</b>	0.250	0.266	0.389	0.734	0.6
<b>Natural/semi-natural greenspace</b>	1.018	2.552	5.198	9.219	2

There are deficits of parks and gardens in the 400m and 600m catchments, amenity green space in all catchment areas and natural/semi-natural green space in the 400m catchment

### Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF development proposals should include replacement of the play area and kick about area. If this was to be on the adjacent site LP0902, the replacement kick-about area is likely to be smaller than the existing one due to the undulating ground therefore the quality of the playing surface should allow greater usage. The community orchard is on the embankment adjacent to Woodlands Avenue and it would be preferable if this was retained since the trees are well established and it would be impractical to relocate them. A play area of equivalent quality and quantity could be accommodated on LP0902 however construction costs are likely to be higher than if the site was flat. Pedestrian access to LP0902 should be provided through LP0901 to minimise the impact of moving the facilities and the site should be accessible for prams. Habitat improvements should be included within LP902 to compensate for the conversion of part of the natural/semi-natural open space to more formal recreational use

## Site Information

### Site Ref

LP0931

### Site Address

Land at Greave House Field,  
Luddenden Foot.

### Stage 2 Hearing Reference

Matter 19 Item 6:  
Open space provision

## Relevant MIQ Question and Response

**Item 6: Point 4: Land at Greave House Field, Luddenden (LP0931) and Kershaw Drive, Luddenden Foot (LP1372).  
Proposal to replace the amenity open space on Kershaw estate (as set out in the Council's Hearing Statement).**

### MIQ Response:

**d) What value does site LP0931 have as open space, and where is this evidenced? Is the proposal in line with paragraph 74 in the NPPF?**

19.81 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

19.82 Most of the site is currently designated as Protected Land but also performs the function of a natural/semi-natural open space. 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, as shown on map LP0931. Table LP0931 summarising the sites within these buffers shows that there are sufficient alternative natural/semi-natural areas within the catchment of this site to meet the adopted standards. The site also includes a small area of amenity open space, part of Open Space site 206 Kershaw Estate, which consists of a number of small amenity green space sites spread throughout the estate which contribute to the estate's landscape. If the amenity green space site is included within LP0931 it should be replaced within the development to link in with the amenity green space sites within Kershaw Estate.

19.83 Appendix 1 of the Local Plan does not currently contain a requirement for development proposals at this site to include replacement amenity green space within the site. This should be proposed as a minor modification to the site specific considerations to ensure that the proposal complies with paragraph 74 of the NPPF (2012).

**19.84 Proposed Modifications:  
Appendix 1**

**Site Specific Considerations:**

- Development proposals should include on-site replacement amenity green space.

19.85 Map LP0931 and Table LP0931 can be found in Matter 19 Appendix 1 at the end of this hearing statement.

**Quantitative Assessment**

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Sowerby Bridge area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Mytholmroyd	
<b>Parks and gardens</b>	0.000	0.000	0.881	0.309	0.8
<b>Amenity greenspace</b>	3.093	2.336	1.462	1.067	0.6
<b>Natural/semi-natural greenspace</b>	2.430	3.080	7.142	16.826	2

Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchment areas and in the Mytholmroyd area. Amenity greenspace and natural/semi-natural greenspace are well provided for.

**Revised Recommendation to Include Quantitative Assessment**

In order to comply with paragraph 74 of the NPPF high quality open space should be provided on site as part of any development to compensate for the open space loss. Alternatively other open space in the area should be enhanced, for example Holmes Park, Kershaw Estate, Midgley Recreation Ground or Luddenden Recreation Ground.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP0968

**Site Address**

Land at West End Golf Club  
Paddock Lane  
Halifax

**Stage 2 Hearing Reference**

Matter 18 Item 3:  
Current use of the land and  
proposed re-provision

### Relevant MIQ Question and Response

**Q: Is the proposal justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value does the site have, and where is this evidenced?**

18.76 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.77 Discussions between the Council and West End Golf Club have taken place for the club to lease the adjacent Roils Head Playing Field. The club's proposals include extending the golf course and improving existing facilities at Roils Head in partnership with local clubs and the community. The release of LP0968 for housing should be related to this or a similar scheme.

18.80 Proposed Modifications:

Appendix 1

Site Specific Considerations:

*Development proposals should include improvements to open space facilities in the immediate locality.*

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	0.000	0.000	0.215	0.584	0.8
<b>Amenity greenspace</b>	1.109	0.993	2.121	1.745	0.6
<b>Natural/semi-natural greenspace</b>	0.000	0.000	0.929	1.745	2

There are deficits of parks and gardens and of natural/semi-natural greenspace in all areas.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF development proposals should consider improvements to open space facilities in the immediate locality for example at Roils Head playing Fields.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1000

**Site Address**

Land off Woodhouse Lane,  
Rastrick

**Stage 2 Hearing Reference**

Matter 16 Item 11:  
Restrictive covenant to retain as  
open space

### Relevant MIQ Question and Response

**b) In the context of the covenant referred to in Appendix 1 in the Plan, is the site capable of being developed for housing?**

Response n/a in terms of Open Space Quantitative Site Assessment.  
Compensatory Open Space provision not required in Appendix 1.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Brighouse area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Brighouse	
<b>Parks and gardens</b>	0.000	0.000	0.194	0.757	0.8
<b>Amenity greenspace</b>	0.706	0.399	0.548	0.974	0.6
<b>Natural/semi-natural greenspace</b>	3.823	2.161	2.998	2.945	2

Compared to the Calderdale standard there are deficits of parks and gardens in all catchment areas and of amenity green space in the 600m and 1200m catchments.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF development proposals should include the enhancement of other open spaces in the area such as at the adjacent Woodhouse Recreation Ground

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1033

**Site Address**

- Land off Toothill Bank, Rastrick

**Stage 2 Hearing Reference**

Matter 16 Item 5:  
Former and current open space uses  
on the site and compliance with  
paragraph 74 in the NPPF

### Relevant MIQ Question and Response

**LP1033 - Toothill Bank, Rastrick**

**b) Which part of the site was previously in use as a playing field, and how many hectares did this amount to?**

From map data it is assumed that the area of the former playing field is 0.9318ha and is shown as the red hatched area on the plan LP1033, which can be found in Appendix 1 at the end of this hearing statement.

Compensatory Open Space provision not required in Appendix 1.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Brighouse area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Brighouse	
<b>Parks and gardens</b>	0.028	0.013	0.106	0.757	0.8
<b>Amenity greenspace</b>	3.008	2.558	1.512	0.974	0.6
<b>Natural/semi-natural greenspace</b>	0.000	0.000	0.572	2.945	2

There are deficits of parks and gardens in all catchment areas and natural/semi-natural greenspace within the 400m and 600m catchment areas.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF improvements to other open space in the area should be carried out prior to development, for example at the adjacent Carr Green Recreation Ground and Playing Fields.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1041

**Site Address**

Land at West Street and Halifax Road, Shelf.

**Stage 2 Hearing Reference**

Matter 20 Item 4:  
What amenity open space value does the site have?

### Relevant MIQ Question and Response

**c) Does the site have value as an area of amenity space, and where is this evidenced? Is the proposal justified and consistent with paragraph 74 in the NPPF?**

20.35 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

20.36 This guidance is repeated in paragraph 97 of the 2019 NPPF.

20.37 The land has been assessed as low quality amenity greenspace in the Open Space Study. 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, as shown on map LP1041. Table LP1041 summarising the sites within these buffers shows that the only other amenity greenspace in the area is at Shelf Primary School which is not publically accessible. Any development should therefore include an area of good quality publicly accessible amenity greenspace to mitigate the loss of this site.

20.38 The site specific considerations in Appendix 1 of the Local Plan make provision for this compensation and also open space protection. As such, the proposal is considered to accord with paragraph 74 of the NPPF (2012).

20.39 Map LP1041 and Table LP1041 can be found in Matter 20 Appendix 1 at the end of this hearing statement.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Northowram and Shelf area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Northowram and Shelf	
<b>Parks and gardens</b>	0.000	3.620	1.270	3.454	0.8
<b>Amenity greenspace</b>	0.398	0.321	0.429	0.466	0.6
<b>Natural/semi-natural greenspace</b>	0.000	0.070	4.598	5.241	2

There are deficits of parks and gardens in the 400m, of amenity green space in all areas and of natural/semi-natural greenspace in the 400m and 600m catchments

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF development proposals should include the retention and enhancement of open space within the site and/or the improvement of other open space in the area such as at Shelf Hall Park

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1060

**Site Address**

Land at Shirley Grove, Lightcliffe

**Stage 2 Hearing Reference**

Matter 16 Item 6:  
Open space: quantitative evidence  
and compliance with paragraph 74  
in the NPPF

### Relevant MIQ Question and Response

**Item 6: Land at Shirley Grove LP1060 Point 1: Open space: quantitative evidence and compliance with paragraph 74 in the NPPF.**

**MIQ Response:**

**a) Is the proposal justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value does the open space have, and where is this evidenced?**

16.36 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

16.37 The proposed housing site is classed as amenity greenspace in the Open Space, Sport and Recreation Study. 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, as shown on map LP1060. Table LP1060 summarising the sites within these buffers shows that there is sufficient amenity green space within the catchment of the site however there are gaps in some other typologies, for example play facilities for older children. If the site is developed, then improvements to other open space in the area should be carried out. These could include additional equipment at the nearby play area at Bentley Avenue and the provision of goal posts on the grassed area at Aysgarth Avenue.

16.38 In terms of biodiversity, the site is predominantly species poor, short sward amenity grassland of low ecological value. There is a low managed hawthorn and elder hedgerow along the boundary with Bentley Avenue which is a UK Biodiversity Action Plan Priority Habitat which should be retained if possible or similar habitat created within the site. There is also a single cherry tree which should ideally be retained. The site is not within the Calderdale Wildlife habitat network and is not connected to any other significant wildlife habitat.

16.39 Appendix 1 contains a Site Specific Consideration requiring improvements to other open spaces in the vicinity such as Bentley Avenue and Aysgarth Avenue should the site be developed. However, Appendix 1 of the Local Plan does not currently contain a requirement for development proposals to retain the hawthorn and elder hedgerow along the site boundary with Bentley Avenue or the compensatory creation of a similar habitat within the site. The single cherry tree on site should also be retained. These ecological requirements should be proposed as minor modifications to the site specific considerations to ensure that the proposal complies with paragraph 74 of the NPPF (2012).

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Brighouse area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Brighouse	
<b>Parks and gardens</b>	0.236	0.099	0.836	0.757	0.8
<b>Amenity greenspace</b>	0.768	0.784	1.191	0.974	0.6
<b>Natural/semi-natural greenspace</b>	0.000	1.003	0.613	2.945	2

There is a deficit of parks and gardens in the 400m and 600m catchments and within the Brighouse area. In addition there is a deficit of natural/semi-natural greenspace in the 400m, 600m and 1200m catchment areas.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF improvements to other open space in the area should be carried out prior to development. These could include additional equipment at the nearby play area at Bentley Avenue and the provision of goal posts on the grassed area at Aysgarth Avenue.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1356

**Site Address**

Hollins Park, Cemetery Lane,  
Sowerby Bridge

**Stage 2 Hearing Reference**

Matter 19 Item 8:  
Replacement play area

### Relevant MIQ Question and Response

**a) What progress has been made to identify a site for replacement pitches/play area?**

The proposed developer has carried out pre-development work for the site and is in discussions with the Council regarding open space requirements. The Council has held initial discussions with Sowerby Bridge FC who play on the pitches at Hollins Mill Leisure Park about their long term plans to improve facilities at the site. Proposals are at an early stage and need to be linked with the strategic aims of the Sowerby Bridge Development Board. **Children's play facilities could potentially be included at this site.**

Site Specific Condition in Appendix 1: Re-provision of equivalent or better quantity or quality pitches would be required.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Sowerby Bridge area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Sowerby Bridge	
<b>Parks and gardens</b>	0.000	0.010	0.240	0.520	0.8
<b>Amenity greenspace</b>	0.088	0.045	0.247	0.648	0.6
<b>Natural/semi-natural greenspace</b>	3.447	1.300	1.890	2.923	2

Compared to the Calderdale standard there are deficits of parks and gardens in all areas, of amenity green space in the 400m, 600m and 1200m catchments and of natural/semi-natural greenspace in the 600m and 1200m catchments.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF improvements to other open space in the area should be carried out prior to development. These could include facility improvements at the Hollins Mill Leisure Park

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1379

**Site Address**

Heathmoor Park Road/Field Head  
Lane, Illingworth.

**Stage 2 Hearing Reference**

Matter 18 Item 16:  
Loss of open space

### Relevant MIQ Question and Response

**a) Is the proposal justified and consistent with paragraph 74 in the NPPF? What recreational, landscape/amenity and biodiversity value does the open space have, and where is this evidenced?**

18.165 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.166 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, as shown on map LP1379. Table LP1379 summarising the sites within these buffers shows that there are a range of other amenity green space sites in the area, however there are no parks and gardens in the 400m and 600m catchments and no allotments in the 400m catchment. The need for open space to be provided, or neighbouring open space enhanced, as part of any development should be assessed when proposals are put forward and considered in context with other developments being proposed in the area. The visual impact of any development should be considered.

18.167 In terms of biodiversity, this grassland all falls within the Calderdale Wildlife Habitat Network. The grassland forms a buffer zone for woodland, heathland and acid grassland habitat to the immediate west. Although mostly mown as amenity grassland, the 1990 Phase 1 Habitat Survey shows parts of this belt supporting lowland grassland, a UK Habitat of Principal Importance. The grasslands also provide foraging habitat for starling and house sparrow which are both red list birds of conservation concern (rapidly declining breeding populations).

Houses and gardens along this strip are likely to result in the woodland and upland heath habitats on the adjacent land suffering from tipping of garden waste and increased recreational pressure. The aforementioned ecological records are held by West Yorkshire Ecological Services.

18.168 Appendix 1 of the Local Plan requires the consideration of the need for open space in the local area, and the impact on visual amenity currently provided by the site. In addition, consideration for the impact on UK BAP Priority Habitats and the planting of locally native hedgerow to minimise damage to adjacent heathland and the creation of an area of locally native wildflower meadow nearby is required. An area of less improved grassland has already been removed from the developable area. As such, the proposal is considered to accord with paragraph 74 of the NPPF (2012).

18.169 Map LP1379 and Table LP1379 can be found in Matter 18 Appendix 1 at the end of this hearing statement

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	400m	600m	1200m	Halifax	Proposed Calderdale standard
<b>Parks and gardens</b>	0.000	0.000	1.567	0.584	0.8
<b>Amenity greenspace</b>	3.053	3.321	2.023	1.745	0.6
<b>Natural/semi-natural greenspace</b>	4.195	3.493	2.646	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area. There is a deficit of natural/semi-natural greenspace in the Halifax area.

## Revised Recommendation to Include Quantitative Assessment

To comply with paragraph 74 of the NPPF development proposals should include either the provision of open space as part of the development or the enhancement of other open spaces in the area.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1398

**Site Address**

Land on the west side of Brockwell Lane, Triangle, Sowerby Bridge.

**Stage 2 Hearing Reference**

Matter 19 Item 5:  
Open space provision

### Relevant MIQ Question and Response

**Item 5: Point 2: Land on west side of Brockwell Lane, Triange, Sowerby Bridge (LP1398 & LP1412).**

**Open space provision**

**c) Do the sites contain open space? If so, what recreational/landscape/biodiversity value do they have, and where is this evidenced? Are the proposals justified and consistent with paragraph 74 in the NPPF?**

19.52 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

19.53 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, as shown on map LP1398. Table LP1398 summarising the sites within these buffers shows that there are no other natural/semi natural sites within the 400 and 600m catchment areas although there may be green belt sites with the same function. The analysis also shows that there are no parks and gardens or children's play facilities within the catchment area which meet Calderdale's standards. The loss of this open space could be mitigated by providing high quality open space facilities on site as part of any development to rectify current deficiencies.

19.54 In terms of biodiversity, the site supports rows of mature deciduous trees /woodland a UK Habitat of Principal Importance covering approximately 25% of the site. There is also a large pond on Mastermap which is also UK BAP habitat. The pond is reported to support common frog and newts which are both West Yorkshire BAP priority species. The woodland is reported to support badger and bats both UK protected species.

19.55 The site specific considerations in Appendix 1 of the Local Plan mitigate against the loss of open space and provide for new facilities. In addition, there are a number of ecological Site Specific Considerations attached to both sites. As such, the allocation of LP1398 and LP1412 is considered to accord with paragraph 74 of the NPPF (2012).

19.56 Map LP1398 and Table LP1398 can be found in Matter 19 Appendix 1 at the end of this hearing statement.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Sowerby Bridge area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Sowerby Bridge	
<b>Parks and gardens</b>	0.000	0.032	0.024	0.520	0.8
<b>Amenity greenspace</b>	1.191	1.129	1.191	0.648	0.6
<b>Natural/semi-natural greenspace</b>	0.622	0.466	3.217	2.923	2

Compared to the Calderdale standard there are deficits of parks and gardens in all catchment areas, amenity greenspace in the Sowerby Bridge area and natural/semi-natural greenspace in the 400m and 600m catchments .

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF high quality open space facilities should be provided on site as part of any development to help rectify current deficiencies.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1429 and LP1481

**Site Address**

Former St. Catherines High School,  
Holdsworth Road, Holmfield.

**Stage 2 Hearing Reference**

Matter 18 Item 6:  
Existence of sports facilities and  
proposed compensatory provision.

### Relevant MIQ Question and Response

**a) What recreational/open space value does the site have, and where is this evidenced? Does site LP1429 contain two former tennis courts? Does the proposal accord with paragraph 74 in the NPPF?**

18.172 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.173 The Council's Safer, Cleaner, Greener Section originally commented on site LP1429 at a previous stage of the Local Plan. Their comments read as follows:

**18.174 "Site LP1429 and the unallocated SW corner are currently designated as Primary Housing. The development site includes an informal recreation area but no formal sports facilities. The unallocated SW corner includes two former tennis courts. These tennis courts were not included in the Calderdale Playing Pitch Strategy and Action Plan published in 2017, however the strategy found that the majority of courts in the area were of poor quality and recommended that court quality was improved where possible and that local demand for tennis in the area should be explored. It may be possible to include the SW corner in the development area if the loss of the tennis courts was mitigated by improvements to other facilities in the area".**

18.175 Following these comments, the Tennis Courts were included in the site allocation and an appropriate Site Specific Consideration added to Appendix 1 of the Local Plan aimed at protecting relevant open space provision.

18.176 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, as shown on map LP1429\_LP1481. Table LP1429\_LP1481 summarising the sites within these buffers shows that there is no amenity green space, allotments or natural/semi-natural greenspace within the catchment of this site which meets Calderdale's standards. If the site is developed proposals should include the enhancement of facilities at Beechwood Park or Holmfield Park.

18.177 Whilst Appendix 1 of the Local Plan for site LP1429 requires the consideration of the impact of the loss of the two tennis courts on open space provision in the area, no requirement is made for the enhancement of facilities at Beechwood Park or Holmfield Park or open space more generally if LP1481 is developed. This site specific consideration should be added to Appendix 1 as a minor modification for site LP1481 to ensure that proposals accord with Paragraph 74 of the NPPF (2012).

18.178 **Proposed Modifications:**

**Appendix 1**

**Site Specific Considerations:**

Development proposals should consider improvements to open space facilities in the immediate locality to include the enhancement of facilities at Beechwood Park or Holmfield Park.

**Quantitative Assessment**

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	1.075	5.446	1.842	0.584	0.8
<b>Amenity greenspace</b>	0.000	0.211	1.527	1.745	0.6
<b>Natural/semi-natural greenspace</b>	0.000	0.000	0.628	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the Halifax area, of amenity green space within the 400m and 600m catchment areas and of natural/semi-natural greenspace in all areas.

**Revised Recommendation to Include Quantitative Assessment**

In order to comply with paragraph 74 of the NPPF development proposals should consider improvements to open space facilities in the immediate locality to include the enhancement of facilities at Beechwood Park or Holmfield Park.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1451

**Site Address**

Garden Suburbs: Woodhouse.

**Stage 2 Hearing Reference**

Matter 15 Item:  
General Infrastructure  
Requirements

### Relevant MIQ Question and Response

No relevant MIQ Question or Response.  
Site Specific Consideration Appendix 1: Inclusion of Open Space.

### Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Brighouse area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Brighouse	
<b>Parks and gardens</b>	0.000	0.000	0.127	0.757	0.8
<b>Amenity greenspace</b>	0.389	1.162	0.720	0.974	0.6
<b>Natural/semi-natural greenspace</b>	2.105	1.469	2.131	2.945	2

Compared to the Calderdale standard there are deficits of parks and gardens in all areas, of amenity green space in the 400m catchment and of natural/semi-natural greenspace in the 600m catchment.

### Revised Recommendation to Include Quantitative Assessment

In order to comply with Calderdale's open space standards development proposals should include the provision of on-site open space to the quantitative standards.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1463

**Site Address**

Garden Suburbs: Thornhills

**Stage 2 Hearing Reference**

Matter 15 Item:  
General Infrastructure  
Requirements

### Relevant MIQ Question and Response

No relevant MIQ Question or Response.  
Site Specific Consideration Appendix 1: Inclusion of Open Space.

### Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Brighouse area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Brighouse	
<b>Parks and gardens</b>	7.496	2.758	1.248	0.757	0.8
<b>Amenity greenspace</b>	0.675	0.303	0.888	0.974	0.6
<b>Natural/semi-natural greenspace</b>	2.616	0.956	1.786	2.945	2

Compared to the Calderdale standard there are deficits of parks and gardens in the Brighouse area, of amenity green space in the 400m catchment and of natural/semi-natural greenspace in the 600m and 1200m catchments catchment.

### Revised Recommendation to Include Quantitative Assessment

In order to comply with Calderdale's open space standards development proposals should include the provision of on-site open space to the quantitative standards.

## Open Space Quantitative Site Assessment Form

### Site Information

**Site Ref**

LP1486, LP1487, LP1488 and LP1489

**Site Address**

Land off Hambleton  
Drive/Hambleton Crescent/Balkrum  
Road, Mixenden

**Stage 2 Hearing Reference**

Matter 18 Item 17:  
Loss of open space

### Relevant MIQ Question and Response

**a) What recreational, landscape/amenity and biodiversity value do the open spaces have, and where is this evidenced? Do the proposals accord with paragraph 74 in the NPPF? What is the Council's strategy for the re-provision/enhancement of open space elsewhere in the local area?**

18.185 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.186 The sites are currently designated as primary housing but also perform the function of amenity open space. 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, as shown on map LP1486. Table LP1486 summarising the sites within these buffers shows that if all four sites are developed the only amenity greenspace within the 400m catchment would be a relatively small area of 0.0516ha at Hunter Hill and there are no sites 1ha or over in the 600m catchment. One option is for there to be a requirement for open space to be included within any development however because of the existing shortage of amenity recreational space in the area the preferred option is to retain some amenity green space within Hambleton Estate for recreational use which should be of a sufficient size to cater for residents from the proposed developments. There should be a requirement for facilities on the retained open space to be enhanced as part of any development.

18.187 In terms of biodiversity, these sites all consist of short sward amenity grasslands with very limited biodiversity value.

18.188 Appendix 1 of the Local Plan requires the consideration of the cumulative impact on provision of children's play and improvements to existing open space in the locality. As such, the proposal is considered to accord with paragraph 74 of the NPPF (2012).

18.189 Map LP1486 and Table LP1486 can be found in Matter 18 Appendix 1 at the end of this hearing statement.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	0.000	0.000	1.264	0.584	0.8
<b>Amenity greenspace</b>	0.263	1.329	2.012	1.745	0.6
<b>Natural/semi-natural greenspace</b>	9.633	5.969	2.646	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area, of amenity green space in the 400m catchment and of natural/semi-natural greenspace in the Halifax area.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF, due to the shortage of amenity recreational space in the area, the preferred option is to retain some amenity green space within Hambleton Estate for recreational use which should be of a sufficient size to cater for residents from the proposed developments. There should be a requirement for facilities on the retained open space to be enhanced as part of any development.

## Open Space Quantitative Site Assessment Form

### Site Information

Site Ref

LP1547

Site Address

Land at Abbey Park, Illingworth

Stage 2 Hearing Reference

Matter 18 Item 18:  
Loss of open space

### Relevant MIQ Question and Response

#### • Loss of Open Space

18.190 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

18.191 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, as shown on map LP1547. Table LP1547 summarising the sites within these buffers shows that there are other amenity green spaces in the catchment area but no parks or gardens. This site may not be appropriate to create a small park or garden but any development should include the requirement to enhance existing amenity green space in the area to compensate for this deficiency.

18.192 Appendix 1 of the Local Plan requires the consideration of the enhancement of other open spaces in the vicinity. As such, the proposal is considered to accord with paragraph 74 of the NPPF (2012).

18.193 Map LP1547 and Table LP1547 can be found in Matter 18 Appendix 1 at the end of this hearing statement.

## Quantitative Assessment

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Halifax area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Halifax	
<b>Parks and gardens</b>	0.000	0.000	1.675	0.584	0.8
<b>Amenity greenspace</b>	3.079	3.210	1.924	1.745	0.6
<b>Natural/semi-natural greenspace</b>	4.303	2.552	2.828	1.745	2

Compared to the Calderdale standard there are deficits of parks and gardens in the 400m and 600m catchments and in the Halifax area and of natural/semi-natural greenspace in the Halifax area.

## Revised Recommendation to Include Quantitative Assessment

In order to comply with paragraph 74 of the NPPF development proposals should include the enhancement of other open spaces in the area such as Natty Lane Recreation Ground.

## Open Space Quantitative Site Assessment Form

### Site Information

Site Ref

LP1654

Site Address

Politt Fields, 8 Ripon House,  
Sowerby Bridge.

Stage 2 Hearing Reference

Matter 19 Item 8:  
Open space provision

### Relevant MIQ Question and Response

#### LP1654 - Politt Fields, 8 Ripon House, Sowerby Bridge

**a) What is the extent and location of the open space, and what recreational/ landscape/ biodiversity value does it have? Is the proposal consistent with NPPF paragraph 74? Is the requirement to 'consider impact of loss of open space' an effective approach?**

- 19.59 Paragraph 74 of the NPPF (2012) states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:
- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
  - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
  - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

This guidance is repeated in paragraph 97 of the 2019 NPPF.

- 19.60 The site includes amenity green space site 9354 (Land adjacent to Christ Church) which is recommended to be retained in the Open Space, Sport and Recreation Study, only part of which is Open Space Urban in the UDP. 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, as shown on map LP1654. Table LP1654 summarising the sites within these buffers shows that there is a deficit of amenity green space and natural/semi-natural areas within the 1200m catchments and there is a shortage of allotments. Open space should be included within development proposals to mitigate any loss.

19.61 In terms of biodiversity, the site supports a range of deciduous trees of wildlife value for birds, bats and invertebrates. The grassland is short sward amenity mown grass of limited wildlife value.

19.62 Appendix 1 of the Local Plan does not currently contain a requirement for Open space to be included within development proposals to mitigate any loss but does recommend that consideration is given to the loss of open space in general. Given the comments of Safer, Cleaner, Greener, the Council agrees that the Site Specific Consideration should be tightened to require that open space is provided on-site. This should be proposed as a minor modification to the site specific considerations to ensure that the proposal complies with paragraph 74 of the NPPF (2012).

**19.63 Proposed Modifications:**

**Appendix 1**

**Site Specific Considerations:**

~~— 'Consider impact of loss of open space'~~

- Open space should be included within development proposals to mitigate any loss.

19.64 Map LP1654 and Table LP1654 can be found in Matter 19 Appendix 1 at the end of this hearing statement.

**Quantitative Assessment**

The ha/1000 population of open space in the area has been analysed within the catchment areas of the site and within the Sowerby Bridge area and is shown in the table below:

	Ha/1000 population				Proposed Calderdale standard
	400m	600m	1200m	Sowerby Bridge	
<b>Parks and gardens</b>	0.061	0.366	0.582	0.520	0.8
<b>Amenity greenspace</b>	0.966	0.670	0.717	0.648	0.6
<b>Natural/semi-natural greenspace</b>	0.131	0.219	1.538	2.923	2

Compared to the Calderdale standard there are deficits of parks and gardens in all catchment areas, and natural/semi-natural greenspace in the 400m, 600m and 1200m catchments

## **Revised Recommendation to Include Quantitative Assessment**

In order to comply with paragraph 74 of the NPPF improvements to other open space in the area should be carried out prior to development. These could include facility improvements at Beech Recreation Ground or Crow Wood Park.