

CC 117

# Calderdale Local Plan

## **Matter 23:** Employment Land Supply

### **Approach to identifying gross and indicative developable areas for Employment and Mixed Use sites**

A consideration of matters arising following Stage 2 Examination Hearings

## **Calderdale Metropolitan Borough Council**

March 2021



## Calderdale Council Local Plan Examination

### Stage 2 Hearings

#### Matter 23: Employment Land Supply

#### Approach to identifying gross and indicative developable areas for Employment and Mixed Use sites

**CC85 Task List - Task 266:** Council to provide note which lists the employment sites where it is intended to use the indicative developable area rather than gross site area in the supply calculations – and provide clear explanation of the reason for departing from the gross area approach for each site.

#### Council's Response – March 2021

##### 1.0 Background

1.1 This Note is provided in response to the Inspector's request for the Council to prepare a list of Employment sites where it is intended to use the 'indicative developable area' of the site, rather than gross or total area, to calculate the supply of employment land. The proposed Mixed Use sites are also included for completeness.

1.2 The identification and use of 'indicative developable areas' is consistent with the methodology outlined in EV51.1 Site Allocations Assessment Methodology. Para 5.81 states

“...Where consultees have recommended areas of the site to be removed due to potential constraints this has been reflected in the indicative developable area of the site (See example in Appendix 9) This recommendation then forms part of the site specific consideration of the site when developers submit an application for the site”.

1.3 The 'indicative developable area' is assessed in response to recommendations from statutory consultees to exclude land from the developable area. The reasons relate mainly, although not exclusively, to areas of ecological value or heritage sensitivity, flood risk constraints, easements required or ground conditions where known.

1.4 The 'indicative developable area' establishes the boundary *within* which development can take place. It is 'indicative' as it is based on information known at the time of undertaking the site assessment and could alter at the planning application stage when the specific details of site constraints will have been identified.

##### 2.0 Purpose and use of 'Indicative developable area'

2.1 The purpose of using the 'indicative developable area' is twofold when considering the supply of employment land in the local plan.

- a) to set specific site parameters for development that have been identified through the consultation process, especially from statutory consultees, and provide development guidelines in the form of site specific considerations
  - b) to identify the amount of developable land and an indication of the potential capacity of sites to provide employment floorspace,
- 2.2 As the 'indicative developable area' establishes an indication of the amount of land within the boundary that is realistically developable, a more precise assessment of the potential and contribution to the overall land requirement can be made. To assess the capacity of a site in terms of the amount of floorspace that may be provided, standard multipliers are applied. Housing densities are used to assess the potential number of dwellings, and a 'plot ratio' regarding employment floorspace capacity.
- 2.3 The Employment Land Study adopted a plot ratio of 40% to identify the overall land requirement for employment purposes, referencing the ODPM Employment Land Review Guidance Note (2004). It is accepted that individual sites may be developed at a higher and lower plot ratio, depending on the characteristics of the site, and the requirements of the end user, but it is appropriate to use a standard when assessing the overall land requirement.
- 2.4 The plot ratio assumes that a proportion of the land within the boundary will be developed specifically for employment premises, and remaining land used for ancillary uses, eg access, car and vehicle parking, storage, landscaping.
- 2.5 The Council has been asked to consider whether the land excluded from the developable areas, as recommended by the statutory consultees could accommodate such ancillary uses. This could potentially increase the capacity of development on sites.
- 2.6 Each site has been reviewed in the context of the reasons for excluding land from the developable area, and the conclusions are presented in the Appendix -Table 2. Employment sites, and Table 3. Mixed Use sites.
- 2.7 A summary table of all sites is presented in Appendix Table 1.

### **3.0 Conclusions**

- 3.1 Following the review there has been no change in the of the 'indicative developable areas' for most sites, and any increases have been marginal.
- 3.2 Areas outside the 'indicative developable area' have generally been excluded on the recommendations of consultees with regard to sensitivities around ecology, heritage, and flood risk, and this is particularly true in regard to sites where a larger proportion of the area is excluded.
- 3.3 Following the recommendation of consultees, on most sites it is not considered appropriate to allow ancillary development within the areas that have been recommended for exclusion. Whilst landscaping can be viewed as an exception to this conclusion, again on the majority of sites, it isn't appropriate to assume that normal landscaping associated with industrial development( eg around buildings , car parking, for visual amenity) would be best located in these areas. The

excluded areas are unlikely to serve these purposes and have been excluded for specific and additional reasons.

- 3.4 Information obtained from the Mixed use Capacity Assessment Report is used to identify the amount of land within Mixed use sites that could be developed for employment use, and this has reduced the amount of land previously assumed to be appropriate.

#### **4.0 Actions**

- 4.1 The Council will ensure that the monitoring systems in place will record the provision of new employment floorspace in terms of floorspace, size of site , and plot ratios, in order to enable the comprehensive review of delivery at stages during the lifetime of the Local Plan.

## Appendix

**Table 1 Employment and Mixed Use Sites – Total and Indicative Developable Areas - revised**

**Table 2. Employment Sites** - where Indicative Developable Area is less than total (gross) area

**Table 3. Mixed use sites** - where Indicative Developable Area is less than total (gross) area

**Table 1 Employment and Mixed Use Sites – Total and Indicative Developable Areas - revised**

<b>Brighouse</b>			
<b>Employment</b>		Total site Area (ha)	Total Indicative area (ha)
LP0332	Brow Mills Industrial Estate	0.53	0.53
LP0585	Anchor Place	0.82	0.80
LP1232	Wakefield Road/Clifton Common	25.42	21.38
LP1618	Land west of Huddersfield Road	7.40	5.83
<b>Mixed use</b>		Total site Area (ha)	Total area employment use (ha)
LP0032	Crosslee	10.9	1.96
LP0579	Bradford Road	0.42	0.2
<b>Elland</b>			
<b>Employment</b>		Total site Area (ha)	Total Indicative area (ha)
LP0009	Land to the south Lowfields Way	3.08	2.88
LP0021	Land at Ainley Top	4.60	3.03
LP0025	Land to the south of Dewsbury Road	1.66	1.66
LP0059	Land to west of Medical Centre	0.30	0.30
LP0355	Ainleys Industrial Estate	0.33	0.33
LP0960	South Lane	5.86	5.86
LP1223	Lowfields, Lacy Way	2.27	2.27
LP1443	Wistons Lane and Jubilee Way	0.50	0.50

<b>Mixed use</b>		Total site Area (ha)	Total area employment use (ha)
LP0509	Dewsbury Road	1.9	1.32
LP1088	West Vale Works	0.8	0.28
LP1123	Kinnaird Close	1.73	0.64
<b>Halifax</b>			
<b>Employment</b>		Total site Area (ha)	Total Indicative area (ha)
LP0105	Listers Road	0.30	0.30
LP0409	Bob Lane/Hubert Street	0.71	0.71
LP0472	Lilly Lane	0.78	0.61
LP0805	Holmfield railway line	1.37	1.37
LP0976	Clarence Mill, Pellon Lane	0.43	0.43
LP1018	West of Holmfield Industrial Estate	6.10	4.32
LP1133	Sedbergh Road and Siddal New Road	4.37	2.87
LP1134	Shaw Lodge Mill Complex	1.32	1.05
LP1203	Star Garage, Wakefield Road	1.01	0.52
LP1217	Holmfield Industrial Estate	1.31	1.31
LP1218	SE Holmfield Industrial Estate	0.48	0.39
LP1219	North of Holmfield Industrial Estate	6.85	6.28
LP1231	Shay Lane	3.91	1.59
LP1433	Land off Old Lane	0.38	0.24
<b>Mixed Use</b>		Total site Area (ha)	Total area employment use (ha)
LP0264	Well Lane/King Street	0.39	0.12
LP0289	off King Cross Street	0.42	0.17
LP0370	Armitage Road	0.26	0.13
LP0749	Stoney Royd Mills	0.4	0.04
LP1170	Mulcture Hall Road	3.24	0.34
LP1431	former Mayfield garage	0.87	0.4
LP1632	Horton Street	1.56	0.09
<b>Hebden Bridge</b>			
<b>Mixed use</b>		Total site Area (ha)	Total area employment use (ha)
LP0922	Former Fire Station	0.37	0.22

<b>Mytholmroyd</b>			
<b>Employment</b>		<b>Total site Area (ha)</b>	<b>Total Indicative area (ha)</b>
LP1622	Top Land, Cragg Vale	8.38	5.65
<b>Ripponden</b>			
<b>Employment</b>		<b>Total site Area (ha)</b>	<b>Total Indicative area (ha)</b>
LP1640	Zodian House	1.33	0.55
<b>Sowerby Bridge</b>			
<b>Employment</b>		<b>Total site Area (ha)</b>	<b>Total Indicative area (ha)</b>
LP1220	Adjacent Lloyds, Wakefield Road	3.98	3.55
<b>Todmorden</b>			
<b>Mixed use</b>		<b>Total site Area (ha)</b>	<b>Total area employment use (ha)</b>
LP0327	off Halifax Road	0.33	0

**Table 2. Employment Sites** - where Indicative Developable Area is less than total (gross) area

Site	Site Area(ha)	Indicative developable area	Reason for difference	Action
<b>Brighouse</b>				
LP0585 Anchor Place	0.82	0.8	0.02ha Mitigation against any potential harm to Habitat of Principal Importance, through provision of a 10m standoff from the river as recommended by the West Yorkshire Ecology Service. Exclusion of an area along the riverbank from development is also necessary to satisfy requirements of a flood risk sequential test recently undertaken by JBA Consulting.	No change  The provision of standoff has a minimal effect on the developable area but is essential to pass the Sequential test. It would not be appropriate for ancillary uses to be included within this area, except landscaping.
LP1232 Wakefield Road/Clifton Common	25.42	21.38	4.04Ha Mitigation against any potential harm to the Habitat of Principal Importance, and Habitat Network, by removal of the woodland corridor from the developable area, as recommended by the West Yorkshire Ecology Service and Council's Conservation (Ecology) Officer.  The site has benefit of outline planning permission, and therefore more detail of the development constraints, and consequent design, layout and provision of the employment premises are known. The details indicate that the density of development within the site is likely to be lower than average.	No change  It would not be appropriate for ancillary uses to be included within this area, except landscaping.

			The 'indicative developable area' for the site in the Local Plan has been assessed in accordance with the Site Assessment methodology and is consistent with the assessment of other sites.	
LP1618 West of Huddersfield Road	7.38	5.02amended	2.36ha amended The site area has been extended to include additional land within the same ownership. Heritage Impact Assessment requires the exclusion of land from the developable area as mitigation for potential harm to the setting of a Listed Building. The inclusion of additional land increased the site area, but the outcome of a review of Heritage Impact Assessment has reduced the 'indicative developable area'.	See CC116  Reduce the indicative developable area from 6.69ha to 5.02ha It would not be appropriate for ancillary uses to be included within this area.
<b>Elland</b>				
LP009 south of premises, Lowfields Way	3.08	2.88	0.2ha Mitigation against any potential harm to Habitat of Principal Importance, Species of Principal Importance, and Wildlife habitat Networks through provision of a 20m buffer (minimum) to river, and 10m buffer along the railway corridor, as recommended by the West Yorkshire Ecology Service. Exclusion of area along the riverbank from development also necessary to satisfy requirement of Flood Risk sequential test recently undertaken by JBA Consulting. Power lines cross the site close to the SW corner, but it is anticipated that any built development is unlikely to take place in this area, and an adjustment to the developable area is not required in this respect.	No change  Whilst the area for exclusion from the developable area is small, it is essential to pass the Sequential test, and appropriate to deter public access as recommended by WYES.  It would not be appropriate for ancillary uses to be included within this area.

LP0021 Ainley Top	4.6	3.03 revised	1.57ha revised The Inspector provided advice (INS 18) following her site visit and consideration of heritage and landscape sensitivities. Consequently, the Council proposes to make modifications.	See CC 116  Reduce 'indicative developable area' to exclude land as recommended in Heritage Impact Assessment (EV28.1). to reflect the possible build line identified and meet the mitigation requirements. Ancillary uses are not considered appropriate within the excluded area. Modifications to site map, Appendix 1 (e.g. indicative floorspace, Site Specific Considerations)
LP0059 Stainland Road, West Vale	0.30	0.27	0.03ha error in boundary of Indicative Developable Area	Amend Indicative Developable Area from 0.27ha to 0.30ha
LP0960 Off South Lane	5.86	5.86	Whilst the Council has agreed to propose modifications to Appendix 1 following a consultation representation from Yorkshire Wildlife Trust and further consideration by the Council's Conservation (Ecology) Officer – (see CC29 Representations and Responses Chapters 7 and 8, and HS13.1 Matter 13 Hearing Statement) it does not consider it appropriate to amend the indicative developable area on ecology grounds at this time. There have been no representations in this respect, and planning permission was granted on the site. However, the ecology considerations may result in a lower density of development.	No change to Indicative Developable Area, but additional wording to be included in Appendix 1 regarding constraints and site specific considerations
<b>Halifax</b>				
LP0105 Listers Road, Shibden	0.3	0.3	Whilst the Council has agreed to propose modifications to Appendix 1 following a consultation representation from the West Yorkshire Geology Trust and further consideration by the Council's Conservation (Ecology) Officer (see	No change to Indicative Developable Area, but additional wording to be included in Appendix 1 regarding constraints and site specific considerations

			CC29 Representations and Responses Chapters 7 and 8, and HS13.1 Matter 13 Hearing Statement) it does not consider it necessary to amend the indicative developable area.	
LP0472 Lilley Lane	0.78	0.61	0.17ha Mitigation against any potential harm to Habitat of Principal Importance, through the provision of a 10m standoff from the watercourse, as recommended by the West Yorkshire Ecology Service	No change
LP1018 West Holmfield Industrial estate	6.10	4.32	1.78ha Mitigation against any potential harm to Habitat of Principal Importance through exclusion of deciduous woodland and provision of a 10m buffer with planting, as recommended by the Council's Conservation (Ecology) officer. The exclusion and enhancement of woodland and provision of buffer, is also required to mitigate any potential harm to the setting of a listed building (Holdsworth House) as specified in the Heritage Impact Assessment.	No change It would not be appropriate for ancillary use, other than landscaping to be included within this area.
LP1133 Off Sedburgh Road and New Road	4.37	2.87	1.5ha Mitigation against any potential harm to Habitats and Species of Principal Importance, through exclusion and retention of woodland and provision of 10m buffer to watercourse, as recommended by the West Yorkshire Ecology Service. Land also excluded to mitigate against any potential harm to the setting of Listed buildings.	No change It would not be appropriate for ancillary use, other than landscaping to be included within this area.
LP1134 Shaw Lodge Mill	1.32	1.05	0.27 Site located within Wildlife Habitat Network, and provision of buffer to railway required, with	No change It would not be appropriate for ancillary use, other than landscaping to be included within this area.

			planning, as recommended by the conservation (Ecology) Officer.	
LP1203 Star Garage, Wakefield Road, Copley	1.01	0.52	0.49ha Mitigation against any potential harm to Habitats and Species of Principal Importance, through exclusion and enhancement of woodland and provision of 10m buffer to River (Local Wildlife site), as recommended by the West Yorkshire Ecology Service.	No change It would not be appropriate for ancillary use, other than landscaping to be included within this area.
LP1218 Holmfield Railway line, Holdsworth Road	0.48	0.48	0.09ha Land alongside the watercourse has been excluded from the developable area to provide a 8m buffer, where no development shall take place, in order to remove flood risk, as recommended by JBA consulting (flood risk consultants)	Reduce indicative developable area to 0.39ha exclude buffer to watercourse It would not be appropriate for ancillary use, other than landscaping to be included within this area.
LP1219 North of Holmfield Industrial Estate	6.85	6.28	0.57ha Mitigation against any potential harm to Habitat a of Principal Importance, through of 10m buffer to watercourse and space for attenuation wetlands, as recommended by the West Yorkshire Ecology Service.	No change It would not be appropriate for ancillary uses to be included within this area.
LP1231 Shay Lane	3.91	1.59ha amended	1.32ha amended The Indicative developable area comprises a lesser proportion of the site, and several factors have determined this. a) Mitigation against any potential harm to a Habitat of Principle Importance, through the exclusion of woodland, as recommended by the West Yorkshire Ecology Service	Increase the indictive developable area from 1.19 t 1.59ha and Amend Appendix 1.

			<p>b) The exclusion of recently built premises. c) The existence of existing industrial premises/uses within the site boundary.</p> <p>Whilst the development potential is reduced but it is considered appropriate to retain the existing site boundary to enable a comprehensive approach to development. The indicative developable area should include land to the north and south of the new building, as this may be developed for ancillary uses. The capacity of floorspace is unlikely to change as the site will need to retain ancillary uses for existing premises.</p>	
LP1433 Old Lane	0.38	0.24	<p>0.14ha Mitigation against any potential harm to Wildlife Habitat by provision of 10m buffer to watercourse recommended by the Council's Conservation (Ecology) Officer</p>	<p>No change It would not be appropriate for ancillary uses to be included within this area.</p>
<b>Mytholmroyd</b>				
LP1622 Cragg Vale	8.38	5.65 amended	<p>1.73ha amended Mitigation against any potential harm to setting of listed buildings, by exclusion of land in the north east corner, as identified in the Heritage Impact Assessment. Mitigation against any potential harm to Habitats of Principal Importance, and SAC/SPA/SSSI by the exclusion of land in the west of the site. The Council has considered the Inspector's comments regarding the potential impact of development on both landscape and heritage and proposes to pull back the boundary of the</p>	<p>See CC116 Reduce the 'indicative developable area' from 7.63ha 5.65 ha and amend Appendix 1 to include wording that states that the developable area will be determined by landscape work at the planning application stage.</p>

			<p>'indicative developable area' to exclude the eastern slopes.</p> <p>The indicative developable area includes the existing business park. Whilst new development is likely to be an extension to the park, with existing buildings retained, it is considered appropriate to include this area within the indicative developable area to ensure comprehensive development and good design bearing in mind the sensitivities of the site. It is envisaged that development will be of a low density.</p>	
<b>Ripponden</b>				
LP1640 Zodian House, Station Road, Sowerby Bridge	1.33	1.33	Site boundary and indicative developable area revised to exclude existing premises, (Intention to retain existing buildings as indicated in recent planning permission granted in 2020 on reduced site area)	Amend Appendix 1 Site area and Indicative developable area to 0.55ha.
<b>Sowerby Bridge</b>				
LP1220 Adj Lloyds, Wakefield Road	3.98	3.55	0.43ha Mitigation against any potential harm to a Species of Principle Importance, and Wildlife Habitat Network by excluding land and providing amphibian habitat along the north and west of land, as recommended by the West Yorkshire Ecology Service	No change It would not be appropriate for ancillary uses to be included within this area.

**Table 3. Mixed use sites** where Indicative Developable Area is less than total (gross) area

Site	Site Area(ha)	Indicative developable area	Reason for difference	Note
<b>Brighouse</b>				
LP 0032 Site of former Crosslee factory	10.90	8.56	2.34ha following extension of site boundary. Mitigation against any potential harm to Habitat and Species of Principal Importance, and Wildlife Habitat Network through exclusion as recommended by West Yorkshire Ecology and the Council's Conservation Officer (Ecology).	See CC109 Draft masterplan from landowner, and SoCG indicates that an area of 2ha will be devoted to Employment uses (equivalent to former Employment allocation), and the assessment of the indicative floorspace for employment uses is based on this area.
<b>Elland</b>				
LP1088 West Vale Works	0.8	0.47	0.33Ha Land has been excluded from the indicative developable area to reduce area of flood risk on the recommendation of the Level 2 SFRA. This stated that no development should take place in flood zones 2 and 3	Land for employment use is estimated to be 0.28ha
<b>Halifax</b>				
LP0749 Stoney Royd	1.52	0.4	Land has been excluded from the indicative developable area for two reasons. a) to reduce area of flood risk on the recommendation of the Level 2 SFRA. This stated that no development should take place within 8m either side of the watercourse/culvert b) to provide the opportunity to address a designated heritage asset in a poor state of repair,	Land for employment use is estimated to be 0.04ha  Conversion of existing buildings

			which is considered at risk, by excluding the existing open space and Listed Coal Drops retaining as identified in the HIA.	
LP1170 Mulcture Hall Road	3.24	1.54	1.7ha Mitigation against any potential harm to Habitat a of Principal Importance, and through provision of 10m buffer to Hebble Brook, and creation of habitat corridor, as recommended by West Yorkshire Ecology and the Conservation (Ecology) officer.  Land where gas pipelines are present is also excluded.	Land for employment use is estimated to be 0.34ha