



Final Report

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Local Plan Mixed-Use Site Capacity  
Assessment



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Calderdale Council

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August 2020

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Private and Confidential

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- Appendix 3 – Employment Capacity (Sqm) by Use Class

## Executive Summary

- ES 1 Calderdale Council (the Council) has instructed AspinallVerdi – Property Regeneration Consultants to undertake a site capacity assessment with respect to specific sites which are proposed allocations for mixed use development, as part of the Local Plan adoption process.
- ES 2 Following the Local Plan Publication Draft 2018, the Inspector raised a concern that the housing requirement of 840 dwellings per annum in the Plan does not adequately support the employment growth advanced by the Plan.
- ES 3 The employment land requirement is assessed as 72.54 hectares (albeit 97 hectares has been allocated) and 105,507 sqm of space split:
- Offices B1a/b: 30,062 sqm
  - Manufacturing B1c/B2: -40.59 sqm
  - Distribution B8: 116,507 sqm
- ES 4 Consequently, as part of a wider re-assessment of sites and allocations, the Council revisited their mixed-use allocations increasing the number of residential dwellings. This resulted in the Housing Requirement Update and Potential Supply document published in January 2020.
- ES 5 This assessment was done without consideration as to how it would impact the mixed-use nature of the sites. The purpose behind this report therefore, is to assess the suitability and capacity of each mixed-use allocation from a more detailed and market focused perspective, providing a quantum of employment floorspace and number of residential dwellings.
- ES 6 ES Table 1 summarises the assessment of each site and shows where there has been a decrease or increase in employment ('B' use) floorspace (sqm) and a decrease or increase in residential dwellings. In total, we are estimating that there is 13,883 sqm less of employment capacity than as assessed at the Publication Draft stage and an increase in residential yield by 617 dwellings.

**ES Table 1 - Summary of mixed-use site allocations capacity**

Ref	Publication Draft 2018		AspinallVerdi Assessment 2020		Change from Publication Draft 2018	
	'B' Use Sqm	Dwellings	'B' Use Sqm	Dwellings	'B' Use Sqm	Dwellings
LP0032	0	0	8,000	220	8,000	220
LP0264	3,600	10	1,417	40	-2,183	30

Ref	Publication Draft 2018		AspinallVerdi Assessment 2020		Change from Publication Draft 2018	
	'B' Use Sqm	Dwellings	'B' Use Sqm	Dwellings	'B' Use Sqm	Dwellings
LP0289	2,150	10	472	24	-1,678	14
LP0509	4,908	0	7,900	90	2,992	90
LP0573	0	0	2,741	118	2,741	118
LP0579	2,000	60	2,000	60	0	0
LP0749	0	79	1,699	56	1,699	-23
LP0771	0	30	0	30	0	0
LP0922	2,220	11	2,213	12	-7	1
LP1088	2,820	14	1,428	12	-1,392	-2
LP1123	6,920	38	4,300	68	-2,620	30
LP1170	3,000	42	2,630	131	-370	89
LP1431	3,480	17	3,480	17	0	0
LP1622	29,330	0	10,000	0	-19,330	0
LP1632	4,680	47	2,945	97	-1,735	50
<b>Total</b>	<b>65,108</b>	<b>358</b>	<b>51,225</b>	<b>975</b>	<b>-13,883</b>	<b>617</b>

Source: AspinallVerdi

ES 7 At Appendix 3 – Employment Capacity (Sqm) by Use Class, we provide a breakdown of where the employment capacity sits in terms of use class. This indicates the potential capacity for:

- 26,595.50 sqm of B1a accommodation
- 24,629.50 sqm of B1c/B2 accommodation

ES 8 We summarise some of the key changes behind the difference from the Publication Draft below:

- LP0032 is a new mixed-use allocation resulting in 8,000 sqm of new employment capacity and 220 residential dwellings
- LP0264, LP0289, LP1170 and LP1632 have all been re-assessed and increases in residential capacity has had a negative impact on the quantity of employment space.

- Planning application on LP0509 for residential has enabled more detailed assessment of the site.
- There was no capacity assessment for LP0573, so this is assumed as an increase
- LP0749 is a reassessment of the conversion of the existing mill buildings. Of the three main mill buildings one is assumed to be workspace and then the residential conversion potential of the Mechanics Workshop is reflected.
- LP1622 being unable to accommodate residential and a reduced amount of employment

ES 9 Following our assessment, we would recommend the following changes to allocations:

- Re-allocate LP0771 for residential development
- Re-allocate LP1622 for employment development

# 1 Introduction

- 1.1 Calderdale Council (the Council) has instructed AspinallVerdi – Property Regeneration Consultants to undertake a site capacity assessment with respect to specific sites which are proposed allocations for mixed use development, as part of the Local Plan adoption process. We discuss the background to the study below.

## Background

- 1.2 The Council are currently going through the Local Plan adoption process and following the preparation of the Calderdale Local Plan Publication Draft, the Inspector has raised a concern that the housing requirement of 840 dwellings per annum in the Plan does not adequately support the employment growth advanced by the Plan. The employment land requirement is assessed as 72.54 hectares (albeit 97 hectares has been allocated) and 105,507 sqm of space split:
- Offices B1a/b: 30,062 sqm
  - Manufacturing B1c/B2: -40.59 sqm
  - Distribution B8: 116,507 sqm
- 1.3 Consequently, as part of a wider re-assessment of sites and allocations, the Council revisited their mixed-use allocations increasing the number of residential dwellings. This resulted in the Housing Requirement Update and Potential Supply document published in January 2020.
- 1.4 This assessment was done without consideration as to how it would impact the mixed-use nature of the sites. The purpose behind this report therefore, is to assess the suitability and capacity of each mixed-use allocation from a more detailed and market focused perspective, providing a quantum of employment floorspace and number of residential dwellings.
- 1.5 The mixed-use allocations to be assessed are set out in Table 1.1, this includes two new mixed-use sites from the Draft Publication Local Plan (LP0573 and LP1622).

**Comment [JW1]:** CMBC – Please check and confirm

**Table 1.1 - Mixed-use allocations for assessment**

Ref	Location	Town
LP0032	Former Crosslee Works, Brighouse Road	Hipperholme
LP0264	Well Lane / King Street Car Park	Halifax
LP0289	Land off King Cross Street	Halifax
LP0509	Land and buildings opposite B&M, Dewsbury Road	Elland
LP0573	Land adjacent to Mill Royd Street	Brighouse

Ref	Location	Town
LP0579	126-128 Bradford Road	Brighouse
LP0749	Stoney Royd Mill & Albion Mills	Halifax
LP0771	Firth's Carpets, 432 Bradford Road	Bailiff Bridge
LP0922	Former Hebden Bridge Fire Station	Hebden Bridge
LP1088	West Vale Works, Stainland Road	West Vale
LP1123	Kinnaird Close	Elland
LP1170	Mulcture Hall Road	Halifax
LP1431	Former Mayfield Garage, Queens Road	Halifax
LP1622	Top Land, Cragg Vale	Hebden Bridge
LP1632	Horton Street	Halifax

## Methodology

- 1.6 The Site Allocations Assessment and Methodology (July 2017) sets out the process that the Council has undertaken in identifying and allocating the above mixed-use sites as part of the Local Plan. This follows six stages:
1. Site identification
  2. Suitability
  3. Development potential
  4. Sequential approach
  5. Availability
  6. Achievability
- 1.7 Once sites have been identified, stages 2-3 are about assess the suitability of sites for development. As part of stage 3, the following density multipliers are used to establish the potential quantum of residential development on a site.

**Figure 1.1 - Density multipliers used as part of site allocations assessment methodology**

Location	Site Size	<0.4ha	0.4 – 2ha	>2ha
	Gross to Net Ratio	100%	90%	75%
		dph	dph	dph
Town Centres	Gross Density	60	60	60
	<b>Net Density</b>	<b>60</b>	<b>54</b>	<b>45</b>
Near Public Transport Nodes (e.g. Rail Station 800m)	Gross Density	50	50	50
	<b>Net Density</b>	<b>50</b>	<b>45</b>	<b>38</b>

Location	Site Size	<0.4ha	0.4 – 2ha	>2ha
Walking distance of town centres (750m)	Gross Density	50	50	50
	Net Density	50	45	38
Other urban areas	Gross Density	40	40	40
	Net Density	40	36	30
Rural areas	Gross Density	35	35	35
	Net Density	35	32	26

Source: Table 4.8 of Site Allocations Assessment Methodology (July 2017)

- 1.8 For employment uses, the capacity is more complex to quantify as it depends on the type of employment e.g. offices, industrial and warehouses. Ultimately, the final use and capacity of the site would be determined at the application stage as flexibility is required to meet the specific needs of the end user(s).
- 1.9 The same issue applies to mixed-use sites, albeit the neighbouring land uses and amount of residential (on site and neighbouring) would influence the use and capacity of the site for employment purposes. As part of the Draft Publication, the Council used the density multipliers set out in Figure 1.1 on 50% of the site area to reflect the mixed-use nature of the allocations.
- 1.10 After stage 3, the sites are chosen in line with a sequential approach (stage 4). Stage 5 tests whether the site is actually available for development and stage 6 assessed the viability of the site.
- 1.11 In this study the whole process set out above has not been revisited, but have re-explored the suitability of the sites and the development potential (Stages 2-3). Where considered necessary, we have made comment on the delivery of the site.
- 1.12 In order to assess the development potential or capacity of each site, we have:
  - Reviewed the Site Assessments Report prepared as part of the draft Local Plan
  - Reviewed existing information regarding the site, including:
    - Planning applications
    - Feasibility studies
    - Marketing particulars
  - Reviewed live planning applications in the locality of each site to identify precedents of development density, height, mix and use / typology.
  - Reviewed recently completed schemes in the locality of each site to identify other precedent developments
  - Inspected the site to confirm and assess:
    - Land type (e.g. brownfield, greenfield or mixed)
    - Topography

- Current uses
  - State of current buildings on site (from an external inspection)
  - Adjacent land uses
- 1.13 This process has enabled us to consider the constraints and opportunities of each site to explore whether the development capacity could be adjusted and / or increased. We have also given consideration to wider property market trends in our assessment. However, clearly, we are in an unprecedented time of uncertainty caused by Covid-19. We discuss the implications of this below.
- 1.14 Having individually assessed each site looking at their capacity, we provide an overall summary of the position in terms of residential units and employment floorspace that can be delivered. We also provide a comparison back to the Publication Draft to indicate how many units / floorspace have been gained or lost.

### Impact of Covid-19

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- 1.15 This study concerns mixed-use sites of primarily housing and employment uses. As these sites will come forward over the plan period (next 15 years), we consider there is sufficient time for an economic recovery meaning that the short to medium term impacts of Covid-19 will not detrimentally impact the delivery of the mixed-use allocations in Calderdale's local plan.
- 1.16 Fundamentally, there is still a housing shortage and affordability crisis that is on the government agenda and the housing market will continue to be important, evidenced by the Chancellor making changes to Stamp Duty Land Tax to stimulate the market. The Government is also expected to announce measures to 'simplify' the planning system to stimulate development as a part of its 'Build, Build, Build' agenda. Some initial changes have already been announced with regards to the use class system and permitted development rights which we summarise in the following chapter.
- 1.17 In terms of employment, the outlook for the industrial and office sectors is more complex and varied at a national, regional and local level.
- 1.18 The industrial sector has appeared to be the most resilient core property sector, partly due to the market being well positioned before the pandemic (i.e. supply levels low and demand strong), but also as a response to Covid-19, for example:
- Greater proportion of online sales increasing reliance on storage and distribution space to service customers
  - Pressures and concerns over supply chains resulting in demand for more 'contingency' space

- 1.19 In terms of offices, the sector has been more significantly impacted by the Government's response to Covid-19 and the work from home message. The office market has therefore been more muted in terms of deals done and that is a reflection of companies changing and re-evaluating their real estate strategies.
- 1.20 There has been much debate about the future of the office, however, the consensus amongst the property industry is that businesses requirements will change, but it will not lead to the end of offices. As part of the RICS UK Commercial Market Survey for Q2 2020, 64% of respondents believe that demand would shift to more suburban locations over the next two years. Furthermore, 93% of respondents anticipate that businesses will scale back their space requirements over the next two years.
- 1.21 We are still in the early stages of Covid-19, particularly from a property market perspective where it takes time for the market to respond and for market evidence to reflect the changing circumstances. In our assessment of the sites from a capacity perspective, we have used our experience and judgement to assess the sites and looked to local precedents to inform the analysis. This is considered a robust approach whilst there is a lack of evidence to indicate how the development market will respond to Covid-19 in terms of scheme design and density.

## Inspector's Matters Issues and Questions

- 1.22 The Inspector has raised a number of Matters, Issues and Questions (MIQs) in advance of the Stage 2 Examination. Matter 12 relates to the site assessment process and therefore, the table below summarises the issues and questions posed (which are considered relevant to this report), and our response having set out our methodology above.

**Table 1.2 – Issues & Questions under Matter 12 Site Assessment Process**

Issue	
Is the Plan's approach to assessing site allocation options and releasing land from the Green Belt soundly based and consistent with national policy?	
Questions	AspinallVerdi response
d) to what extent are the indicative capacities on the allocation sites based on a site-specific assessment of location, constraints and the character of the site and surrounding area, rather than application of density multipliers listed in stage 3 of the assessment process in the SAAMs?	Based on a site-specific assessment using existing information and local precedents. Where necessary, density multipliers have been used but these reflect the nature of the site and are based on local evidence.

e) which sites have been allocated although site availability is not known?	We have not been instructed to assess site availability.
f) which of the proposed allocations in the Plan have been identified as having viability issues? Is the inclusion of these sites soundly based?	We have not been instructed to assess the viability of sites. However, the mixed-use allocations are all brownfield (with the exception of LP1622) and the regeneration of brownfield sites is considered a strategic national policy. Therefore, if the sites are 'available', then they should be a regeneration priority regardless of viability as there are public funds available to address market failures.
j) was the process of site assessment carried out as part of the Council's recent consultation on proposed additional allocated sites, robust and fit for purpose?	This report is part of the Council's response to ensure the most recent site assessments are robust and fit for purpose.

**Issue**

Do the allocation policies generally provide a clear and effective framework for growth?

Questions	AspinallVerdi response
b) how were the indicative B use floorspace figures and the estimate number of dwellings derived for mixed-use allocations, as set out in Policy SD6?	These have been re-assessed and the general method for assessment was set out above. However, under each site we have explained our rationale and approach.

Source: AspinallVerdi referencing Inspector's Pre-Hearing Questions, 27 May 2020

1.23 We deal with MIQs relating to specific allocations, individually throughout the report.

## 2 National Planning Policy Changes

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- 2.1 We summarise below some changes to the planning system that may impact the development of the mixed-use allocations over the plan period.
- 2.2 Generally, the changes provide greater flexibility in terms of use classes and permitted development rights to incentivise development or repurposing buildings as well as increasing density.
- 2.3 In addition to the mixed-use allocations, there may be 'windfall' development over the plan period which we would expect in Calderdale is more likely to increase the number of residential dwellings over employment floorspace.

### Use Classes

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- 2.4 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 has introduced three new broad use classes:
- E: Commercial, business and service – this will subsume the existing A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business) use classes.
  - F1: Learning and non-residential institutions – this will include uses for the provision of education, display of works of art, as a museum, public library or exhibition hall, or in connection with public worship or religious instruction.
  - F2: Local community uses – including smaller shops (< 280 sqm) selling mostly essential goods (including food) and where there is no such facility within 1,000 metre radius. It also includes halls or meeting places for the principal use of the local community, or a place for outdoor sport / recreation.
- 2.5 There are a number of uses which have been moved to sui generis (i.e. not in a specific use class), these include:
- Drinking establishments (formerly A4)
  - Hot food takeaways (formerly A5)
  - Cinemas, concert halls, bingo halls and dance halls (formerly D2)
- 2.6 It is worth noting that B2 (General industrial) and B8 (Storage or distribution) retain their designations.
- 2.7 The regulations come into force in September 2020, however for the purpose of permitted development (PD) rights only, the existing use classes will remain until 31<sup>st</sup> July 2021 when these rights will be reviewed by government. We discuss some changes to PD rights that have been enacted as a response to Covid-19 before the review next year.

- 2.8 For the purpose of our study, we have referred to 'employment space' (meaning all B uses) and where considered necessary, made the distinction between B1, B2 and B8 uses. This ensures the findings remain 'future proof' when B1 becomes use class E.

## Permitted Development Rights

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- 2.9 There have been a number of changes to permitted development (PD) rights and we summarise those considered relevant to this study below.

## Upwards Extensions

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- 2.10 The Town and Country Planning (General Permitted Development) (England) (Amendment) (No.2) Order 2020 has introduced four new PD rights allowing upwards extensions, which are:
- Class AA - permits the construction of up to two new storeys of flats on top of detached buildings in commercial or mixed-use buildings (including where there is an element of residential use).
  - Class AB – permits the construction of new flats on top of terrace buildings (including semi-detached buildings) in commercial or mixed-use buildings (including where there is an element of residential use).
  - Class AC – permits the construction of new flats on top of terrace dwelling houses and semi-detached houses.
  - Class AD – permits the construction of new flats on top of detached dwelling houses.
- 2.11 We note that conversions would not be allowed if the floor to ceiling height of any additional storey, measured internally, would be lower than three metres.
- 2.12 None of the rights apply in conservation areas.
- 2.13 These new rights do not apply to building constructed before July 1948 or after 5 March 2018 and will come into effect on 31 August 2020.
- 2.14 In the context of this study, a number of the mixed-use allocations have existing buildings on site, and therefore the changes to these rights potentially increase the capacity of the sites where buildings are retained. However, if the condition of the buildings is not suitable for refurbishment or conversion, then changes to rules regarding demolition and redevelopment will also help increase development density. This is explained below.

## Demolition and Redevelopment

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- 2.15 The Town and Country Planning (General Permitted Development) (England) (Amendment) (No.3) Order 2020 has enacted a new right to demolish vacant and redundant free-standing buildings (classed as offices, premises for research and development or light industrial processes and purpose-built residential blocks) and replace them with new residential units. The buildings must have been built before January 1990 and have been 'entirely vacant' for at least six months prior to the application made for prior approval.
- 2.16 The new building cannot be larger than the footprint of the existing building and cannot exceed 1,000 sqm, but can be up to seven metres higher to accommodate up to two additional residential storeys within an overall maximum height of 18 metres.
- 2.17 Storey heights in developments differ but are generally between 3-4 metres, so these changes may enable a building of say 2 storeys to increase to 4 or at the upper end, a 4-storey building increase to 6.

### 3 Local Planning Policy

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- 3.1 We have reviewed the Local Plan Publication Draft so that we have an understanding of policies that will have an impact on the mixed-use allocations we are reviewing.

#### Policy SD6

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- 3.2 Policy SD6 (see Figure 3.1) is a specific policy concerning the mixed-use allocations.

**Figure 3.1 – Policy SD6 Allocated Mixed Use Sites**

**Policy SD6 Allocated Mixed Use Sites**

The following sites are allocated to provide land for development of a range of mixed uses, and are indicated on the [Policies Map](#).

Proposals including a mix of the Use Classes specified will be permitted provided that the proposed development:-

1. relates well in scale and character to the locality; and
2. does not create any unacceptable impacts on the environment, amenity, safety, highway, or relevant considerations; and
3. is not piecemeal development that would prejudice the comprehensive development of the site, and
4. is consistent with Polices for Retail and Town Centres, and other relevant policies in the Local Plan.

Proposals to develop a Mixed Use site for a single use, or which include a disproportionately high amount of a one particular use will only be permitted in exceptional circumstances. Such applications will need to be justified in terms of their non-suitability for mixed use development, or their contribution to the overall mix of uses in the local area, or their inclusion within a wider regeneration project where added benefits can be justified.

Ancillary uses will also be acceptable providing that they are compatible with other proposed uses on site, and adjacent uses in the locality, and proposals must comply with the criteria (1-4) listed above.

Source: Calderdale Local Plan Publication Draft, 2018, Page 56

- 3.3 This is largely a design orientated policy; however, consideration must be given to scale of development. Therefore, on our site visits we took into consideration storey heights of neighbouring buildings and used these as precedents to support our assessment of capacity where flats are proposed for example. We have also used local precedents as examples given that they have already secured planning permission.
- 3.4 With regards to point 4, we have reviewed the Local Plan Publication Draft policies map to ensure that we are aware if any sites are in primary shopping areas or are secondary frontages as this would reduce the capacity of residential and employment uses.

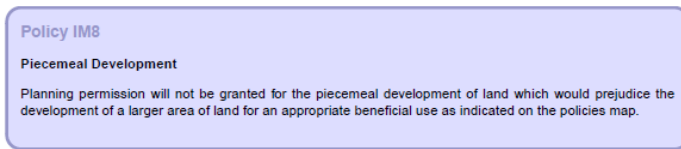
- 3.5 Part of SD6 addresses the extent and quantity of mixed-uses on site and indicates that only in exception circumstances would sites be permitted with a disproportionately high amount of one particular use. Whilst it does not provide a fixed mix or split of uses as a target, the policy does indicate there is some flexibility as uses may be 'ancillary'. Each site has been assessed independently, meaning site-specific constraints or opportunities have fed into our analysis. Where obtaining a mix of uses is not considered possible or is challenging, we have made this comment in our assessment.

## Policy IM8

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- 3.6 Policy IM8 indicates that the development of sites cannot ransom or impede the ability of another parcel of land to be developed. We have taken this into consideration on larger allocations where not the whole site is expected to be developed and where there are existing planning permissions or consents on part of the site.

**Figure 3.2 - Policy IM8 Piecemeal Development**



Source: Calderdale Local Plan Publication Draft, 2018, Page 105

## Policy RT7

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- 3.7 Policy RT7 places requirements on residential development in town centres. This has fed through into our assessments where for example, existing buildings would be retained and there is existing active ground floor uses.

**Figure 3.3 - Policy RT7 Residential Use in Town Centres**

**Policy RT7**

**Residential Use in Town Centres**

Residential proposals in designated town centres including the conversion of accommodation above shops and businesses will be encouraged and supported where :

- i. the predominant retail character of the Primary Shopping Areas and Primary and Secondary Shopping Frontages are not harmed;
- ii. there is no fragmentation of any part of the Primary Shopping Area by creating a significant break in the shopping frontage;
- iii. an active ground floor use is maintained or provided;
- iv. adequate attenuation of noise measures, the protection of privacy and air quality are provided;
- v. any external alterations to the building are in accordance with the relevant Local Plan policies relating to design and materials;
- vi. adequate access arrangements are available including facilities for the storage of, bicycles, refuse; and
- vii. access to car parking provision in line with the Council's Car Parking Strategy.

Where proposals are classed as a change of use, the Flood Risk Sequential and Exception Tests as detailed in Policy CC2 do not apply. However, there is still a requirement under the NPPF and nPPG to submit an assessment of flood risk which demonstrates that safe access and egress can be achieved.

Source: Calderdale Local Plan Publication Draft, 2018, Page 122

## Policy HS3

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- 3.8 Policy HS3 sets out the policy regarding housing mix and indicates that each scheme should be informed by the latest SHMA. We have ensured our assessment is based on the Council's most up to date evidence base in terms of mix and unit sizes.

**Figure 3.4 - Policy HS3 Housing Mix**

**Policy HS3**

**Housing Mix**

- i. In order to meet the housing needs of the Borough over the Plan period, the Council will seek a mix of type and size of new housing.
- ii. Proposals for housing developments of 10 or more dwellings will be expected to provide for a mix of housing in terms of size, type, tenure and affordability; and additionally, proposed housing developments of 30 or more dwellings should be accompanied by a statement setting out how the mix of housing will assist in meeting local needs. The various house types, sizes and needs being met should be spread throughout the site.
- iii. The housing mix should be informed by the most recent SHMA together with other relevant and recent information, and also taking into account market factors, and the location and characteristics of the site.

Source: Calderdale Local Plan Publication Draft, 2018, Page 126

## 4 Site LP0032 Former Crosslee Land & Premises, Hipperholme

4.1 Table 4.1 summarises some key background information regarding the site.

**Table 4.1 - LP0032 site information summary**

<b>Address</b>	Former Crosslee land and premises, Brighthouse Road, Hipperholme HX3 8EF
<b>Gross area (ha)</b>	10.90
<b>Appropriate planning uses</b>	A, B, C and D
<b>Current use</b>	Primary: Industrial manufacturing  Secondary: N/A - although large part of site remains unused
<b>Adjacent land uses</b>	North: Business premises, drinking premises and overgrown grassland / woodland  South: Industrial and residential  East: Agricultural grass land, open storage and residential  West: Agricultural and industrial
<b>Publication draft status</b>	LP0032 was allocated for employment, this allocation was for a parcel of land that would be an extension to the existing Crosslee premises. This is shown in Figure 4.1 overleaf.  The landowner also had part of the wider site included in the publication draft for residential with two separate allocations. LP116 was identified as having a capacity of 50 dwellings and LP1648 the capacity for 31 dwellings.

4.2 Since the publication draft, the Crosslee factory ceased operation in 2019 and the owners now wish to develop the whole site for a mix of uses as the existing employment space on site is considered redundant.

4.3 The owners have stated there is no demand for the existing building, nor to develop the whole site for employment use and therefore propose a mix of retail, residential, employment and potentially some D uses. LP116 and LP1648 are retained as residential allocations with LP0032 now proposed as a larger, mixed-use allocation that incorporates the existing Crosslee factory.

- 4.4 This context should address the Inspector's question regarding the site – *'Is the site available for employment use?'*, as employment is proposed as part of the mixed-use allocation. We discuss the quantity of employment space below and consider whether this constitutes a loss or gain.

**Figure 4.1 - Plan of old LP0032 allocation**



Source: Calderdale Metropolitan Borough Council

- 4.5 We provide a more detailed plan for the proposed mixed-use development of the site at Appendix 1. However, Figure 4.2 provides an indicative site boundary for the revised LP0032 allocation.

**Figure 4.2 - Revised boundary for LP0032 allocation**



Source: Calderdale Council

## LP0032 site assessment

4.6 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 4.2 we provide a summary of the site assessment undertaken to support the publication draft plan. This was prepared on the basis of the smaller allocation for employment use.

**Table 4.2 – LP0032 site assessment report summary**

<b>Flooding RAG</b>		Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>		No significant impact on the road network
<b>Site Access RAG</b>		Potential access issues which are resolvable
<b>Local Road Network RAG</b>		Impact on the road networking requiring mitigation
<b>Ecology RAG</b>		No impact on environmentally sensitive areas
<b>Open Space RAG</b>		No loss / no impact
<b>Historic Environment RAG</b>		Some impact which could be mitigated

**Housing Services RAG** Positive

**Business and Economy RAG** Positive (see below)

**Minerals RAG** Within MSA

**Environmental Health RAG** There is no significant detrimental effect that cannot be mitigated against

**Physical Constraints RAG** Relatively flat

**Landscape RAG** No significant harm on the landscape

Source: Site Assessment Report – Main Report

- 4.7 As part of the business and economy review, LP0032 was considered a deliverable site for employment use as there is a shortage of available premises locally. This fed through into the assessments of LP116 where the allocation for residential was seen as a loss of land that could accommodate employment development.

#### LP0032 site inspection

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- 4.8 We have inspected the site externally see Figure 4.3.

**Figure 4.3 - LP0032 site inspection photos**



View of the site from entrance off Brighouse Road



Aerial view of the site from Google Maps

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Source: AspinallVerdi and Google

- 4.9 From the inspection, there appeared to be very minimal activity at the Crosslee factory site. We understand that activities have ceased this year and that the existing buildings at the site will be demolished. As of July 2020, it did not appear that demolition had commenced but not all of the site is visible from Brighouse Road and we were unable to inspect the parcel of land (LP0032) previously allocated as an extension to the existing facility. However, imagery from Google Maps in 2020 does show that this land remains underdeveloped but is potentially used for open storage.
- 4.10 Figure 4.3 above shows the scale of the existing premises which according to the Valuation Office Agency totals in excess of 25,887 sqm. From our external inspection and looking at the property on Google Maps, we would agree with the landowner that the existing premises are not fit for purpose, other than for Crosslee Plc. We discuss this more below under market evidence and precedents.

#### LP0032 planning history

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- 4.11 There is no implementable planning permission on the proposed LP0032 allocation.

#### LP0032 feasibility studies

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- 4.12 The only information we have received regarding this site is a proposed masterplan of the site which has been referenced earlier at Appendix 1. This shows that the allocation would primarily be delivered for residential development, with:
- Land for 220 dwellings (excluding LP1116 and LP1648)
  - Land for a retirement housing scheme in C2 use
  - Land for 1,801 sqm of A1 food retail
  - 2 hectares of employment land to accommodate 8,000 sqm of industrial floorspace with units ranging from 500 sqm to 1,900 sqm.
- 4.13 This constitutes a net loss of 17,887 sqm of employment (B uses) floorspace. However, we would argue that the new 8,000 sqm of supply would be able to capture demand that would not be met by the existing accommodation and therefore, it has been included in our assessment as 'new floorspace'.

#### LP0032 market evidence and precedents

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- 4.14 We understand that an industrial agent has been marketing the site but there has been very limited demand. As the existing facility is bespoke to Crosslee Plc and of such a significant scale, we are not surprised that the site has not been attractive to a potential occupier.

- 4.15 Through our work advising West Yorkshire Combined Authority on their Enterprise Zones we know that demand in West Yorkshire for industrial premises on this scale would be located closer to the M62. This location is more suited to local demand from smaller businesses but they would have a preference to own the freehold of more modern and smaller accommodation which is flexible and adaptable to accommodate the specific needs of the business. The scale of the premises makes the re-use of the site in its existing form very challenging.
- 4.16 From a development perspective, as it stands the site is not going to be attractive to a developer for solely employment use given the scale of it and the need to demolish the buildings and remediate the site. The viability of development of solely employment uses is challenging in West Yorkshire where the site has such constraints.
- 4.17 However, if the landowner is investing in clearing the site for development then we consider this would improve the marketability of the site for a mix of uses including employment. As stated above, we do not believe the location of the site would be sustainable in terms of a sole employment allocation because demand is more likely to be for smaller units up to 2,000 sqm.
- 4.18 We have reviewed the planning application portal as a proxy for market activity locally to the site and this evidences that primarily the activity is within the residential sector for major applications (see Table 4.3). This includes planning application 20/00386/FUL which has been submitted by Strata who are an active region housebuilder with schemes across Yorkshire and the Midlands.

**Table 4.3 - Planning activity in locality of LP0032**

Planning reference	Description	Status	Density
20/00386/FUL	Remediation and redevelopment of part of the site for 174 residential dwellings (Use Class C3) with associated access, landscaping, areas of public open space and other associated infrastructure. Housing mix: 29% 2 bedroom 24% 3 bedroom 25% 4 bedroom 22% 5 bedroom	Pending consideration	35.6 dph
19/00878/OUT	Demolition of buildings to facilitate construction of 14 houses with access off St Giles Road	Pending decision	24.1 dph
16/01381/OUT	Outline application for residential development of up to 50 dwellings, including details of means of access on land to the east of Brighthouse Road, Hipperholme	Appeal allowed	27.5 dph

Source: Calderdale Council Planning Portal

- 4.19 This is further evidenced by the neighbouring allocations of LP116 and LP1648. We understand that a marketing process has resulted in the identification of a successful bidder for this parcel and with a planning application expected to be submitted for around 90 dwellings in August / September 2020. The fact this residential element of the allocation is progressing is positive as this will make the remainder of the site more attractive from a developer and occupier perspective. In addition, if the Strata scheme proceeds there will be a greater residential population that will create demand for local amenities and employment.

## LP0032 site capacity assessment

4.20 Taking the above into consideration, Table 4.4 sets out the development capacity assessment in the publication draft compared to revised position. We have accepted the approach to site development advocated by the landowner (see Appendix 1).

**Table 4.4 – Summary of site capacity assessment of LP0032**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	1.94	8.96	8.96	Increased as allocation no longer extension of existing facility but redevelopment of whole site.
Residential capacity (dwellings)	0	220	220	Based on masterplan.
Dwellings per hectare	N/A	41	41	Approximate dwellings per hectare – based on high-level scaling using Google Maps.
Employment capacity (sqm)	No capacity assessment	8,000 sqm	8,000 sqm	Based on masterplan which reserves 2 hectares for employment as per the previous employment allocation. This reflects an employment density of 4,000 sqm per hectare / 17,424 sqft per acre.
Other uses	No	1,801 sqm of A1	1,801 sqm of A1	As shown in masterplan – note some land identified for C2 uses but no indication as to quantum.

Source: AspinallVerdi

## 5 Site LP0264 Well Lane/King Street, Halifax

5.1 Table 5.1 summarises some key background information regarding the site.

**Table 5.1 - LP0264 site information summary**

<b>Address</b>	Well Lane / King Street, Halifax
<b>Gross area (ha)</b>	0.39
<b>Appropriate planning uses</b>	B1a, C3
<b>Current use</b>	Primary: Transport Secondary: N/A
<b>Adjacent land uses</b>	North: Industrial and Commercial South: Community Buildings East: Disused / Vacant Land West: Industrial / Commercial
<b>Publication draft status</b>	3,600 sqm of B1a floorspace and 10 residential dwellings

### LP0264 site assessment

5.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 5.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 5.2 – LP0264 site assessment report summary**

<b>Flooding RAG</b>	No Flooding issues
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Positive

<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Outside MSQ or with buffer
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against.
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP0264 site inspection

5.3 We have inspected the site [externally] see Figure 5.1.

**Figure 5.1 - LP0264 site inspection photos**



Looking south towards Minster



Looking north across site



Across site to Stone Dam Mills



Looking north across King Street



The Wool Merchant Hotel



Veterinary development opposite

Source: AspinallVerdi

- 5.4 From our site assessment, we confirm that we agree with the site assessment RAG undertaken. The site has a number of constraints and the proximity of a number of different uses means that careful planning and design would be needed to ensure that conflicts between existing uses are managed. It is our view that there is no use adjacent at the present time which would preclude residential development.
- 5.5 The site is currently used as a car park. The Wool Merchant Hotel remains one of the few hotels within the Town Centre and it can be seen from the above that there has been a relatively new veterinary development opposite. To the west of the site is a car dealership which is on a higher level, although this would not in our view affect the development potential of the subject site.
- 5.6 Stone Dam Mills which is across Well Lane is a significant mill building with five storeys. The Wool Merchants Hotel is four storeys. With these buildings nearby we would consider that development up to five storeys could be accommodated at the site.
- 5.7 The location and size of site makes it suitable for a wide range of uses and in particular residential and office development.

#### LP0264 planning history

- 5.8 A search has not revealed any planning applications for development at the subject site. However, the footpaths outside (but adjacent to) the site form part of the proposed A629 Phase 2 Halifax Town Centre Scheme (20/00217/FUL). The scheme proposes improvements to the public realm and other works which are not proximate to the subject site. The applicant is the Council and this forms part of a significant scheme across the Town Centre.

### LP0264 feasibility studies

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- 5.9 The site was considered as part of the Eastern Corridor Place Making/Sites Unlocking Study (2017). The site was considered with the land at Mulcture Hall Road and together they were referred to as the Cripplegate site.
- 5.10 The study considered two options for this site, the first was B1 Office use and the other residential development. At that time, it was assessed that 3-storey office development could provide up to 3,500 sqm if employment use accommodation. Alternatively, the two-storey residential development could potentially provide 13 units.
- 5.11 The study did not consider a combination of uses.

### LP0264 market evidence and precedents

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- 5.12 The site has been assessed taking the land area and making the assumption that development could come forwards in three separate blocks, which enables phasing and also managing the potential conflicts that could occur. It has been assumed that a B1 office block could be developed to the King Street frontage and the two residential blocks to the Well Lane and Mulcture Hall Road frontages.
- 5.13 The assessment is based on a 45% site coverage and development over 3 storeys.

## LP0264 site capacity assessment

5.14 Taking the above into consideration, Table 5.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. The assessment of the site indicates that the actual capacity of the site for residential units, in the form of apartments enables the number of units to be increased. The amount of employment use development has been reduced, given that it is envisaged that one building could be provided at the site.

**Table 5.3 – Summary of site capacity assessment for LP0264**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
<b>Developable area (ha)</b>	0.39			
<b>Residential capacity (dwellings)</b>	10	30	40	The assessment indicates that the two blocks could provide 30 (1 and 2 bedroom) units each. The average unit size being 70.6sqm. This is relatively generous for town centre apartments and therefore indicates the possibility of more units, subject to detailed design.
<b>Dwellings per hectare</b>	n/a			
<b>Employment capacity (sqm)</b>	3,600	3,600	1,417	This is based on a three-storey development of a building capable of sub-division and multiple occupation for B1a use.

Source: AspinallVerdi

## 6 Site LP0289 Land off King Cross Street, Halifax

6.1 Table 6.1 summarises some key background information regarding the site.

**Table 6.1 - LP0289 site information summary**

<b>Address</b>	Land off King Cross Street, Halifax, HX1 2SH
<b>Gross area (ha)</b>	0.42
<b>Appropriate planning uses</b>	A1, B1a, C3 and D
<b>Current use</b>	Primary: Industrial / Commercial Secondary: Disused / Vacant Buildings
<b>Adjacent land uses</b>	North: Residential South: Industrial / Commercial, Transport East: Industrial / Commercial, Residential West: Community Buildings
<b>Publication draft status</b>	2,150 sqm of B1a floorspace and 10 residential dwellings

### LP0289 site assessment

6.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 6.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 6.2 – LP0289 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Positive

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<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Outside MSA or with buffer
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

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Source: Site Assessment Report – Main Report

### LP0289 site inspection

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6.3 We have inspected the site [externally] see Figure 6.1.

**Figure 6.1 - LP0289 site inspection photos**



Disused building at 2 Kings Cross Street



King Cross Street (nos 6 & 8)



Car Park – Hopwood Lane



Dilapidated buildings Hopwood Lane

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Mixed use conversion opposite



Residential conversion opposite

Source: AspinallVerdi

- 6.4 From our site inspection, we confirm that we agree with the site assessment RAG undertaken. The site is formed by a number of parcels, some with existing buildings and then the car park to Hopwood Lane. The buildings to Hopwood Lane are in very poor condition and one is derelict have suffered from partial collapse.
- 6.5 The site is to the west of the Town Centre, on its fringe. Many of the former retail units which are along the two roads are now being utilised for offices or providing services such as barbers shops.
- 6.6 Opposite the subject site are some examples of buildings being converted to residential use.

#### LP0289 planning history

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- 6.7 A search for planning activity over the last five years has indicated that at 22 and 24 King Cross Street a planning application was made for the provision of 6 residential units above existing retail units (16/00487/FUL). This application was approved in July 2016.
- 6.8 In addition to the above an application was made at 8 King Cross Street in respect of change of use from ground floor offices to tuition centre (17/00221/COU). This application was approved in May 2017.

#### LP0289 feasibility studies

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- 6.9 A viability study for the site has been completed by Cushman & Wakefield in July 2019. It should be noted that this study excluded Nos 6 and 8 Kings Cross Street as these buildings are in use. The study had the benefit of work by architects Gagarin Studios.

- 6.10 The study considered the following quantum of development
- 2-4 Kings Cross Street – community hub, courtyard café and meetings spaces
  - 5-13 Hopwood Lane – small business units
  - Gap site – the development of new residential accommodation which provides 15 new residential units in approximately 1,504 sqm of accommodation.
- 6.11 The study identified a viability gap in terms of development costs against revenue likely to be generated.

### LP0289 market evidence and precedents

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- 6.12 AspinallVerdi have reviewed the work undertaken in the feasibility report and consider that the information contained therein is helpful in establishing the likely amount of accommodation which can be achieved at the site.
- 6.13 We have adjusted the size of residential units as the proposals within the Cushman & Wakefield study were relatively large and by reducing the size of units the viability position should improve as whilst the gross area has not changed the number of units developed increases. Through this adjustment process an additional 3 units could be provided bringing the total to 13.
- 6.14 With respect to 2-4 Kings Cross Street and 5 -13 Hopwood Lane it has been assumed that the upper floors of these premises could be converted to residential accommodation too. The ground floors would be retained for employment/commercial use.

## LP0289 site capacity assessment

6.15 Taking the above into consideration, Table 6.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. The assessment we have undertaken is based on a feasibility study prepared for the site. Adjustment of generous unit sizes enables a greater number of units to be provided than envisaged in the study. The availability of all parts of the site is not known, however the areas where development is envisaged is under-utilised and will require some assembly.

**Table 6.3 – Summary of site capacity assessment for LP0289**

	Publication draft 2018	Housing supply update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	0.42			
Residential capacity (dwellings)	10	32	24	Based on the Cushman & Wakefield/ Gagarin Studio study and adjustment of floor areas to make more efficient units. A further 4 units have been identified on the upper floors of buildings where employment use space will be provided at ground floor level.
Dwellings per hectare	57			It should be noted that this is based on a mixture of apartments and houses, plus conversion of existing buildings.
Employment capacity (sqm)	2,150	2,150	472	Upper floors used for residential use and ground floor accommodation of ancillary commercial uses, assumed B1a (i.e. new commercial E class).

Source: AspinallVerdi

## 7 Site LP0509 Land & buildings opposite B&M, Elland

7.1 Table 7.1 summarises some key background information regarding the site.

**Table 7.1 - LP0509 site information summary**

<b>Address</b>	Land and Buildings opposite B & M, Dewsbury Road, Elland
<b>Gross area (ha)</b>	1.90
<b>Appropriate planning uses</b>	B1a, C3 and D1-D2
<b>Current use</b>	Primary: Industrial / Commercial Secondary: N/A
<b>Adjacent land uses</b>	North: Residential  South: Industrial / Commercial, Residential & Retail  East: Industrial / Commercial  West: Highways
<b>Publication draft status</b>	4,908 sqm of B1a/B1c floorspace but no indication as to residential capacity. This was a retained mixed-use allocation from Replacement Unitary Development Plan.

7.2 The existing uses on site are industrial and commercial with some redundant land and buildings. Since the publication draft assessment of 4,908 sqm of B1a/B1c floorspace, an outline planning application was submitted for residential development on 0.58 hectares of the site (we discuss this below). This has resulted in the Inspector raising the following question:

*Is an alternative mix of uses now proposed, based on the recent planning application?*

7.3 To answer this, the recent planning application has informed the residential capacity of the site and we have considered how much employment can be delivered on the remainder of the site. We set out this assessment below.

### LP0509 site assessment

7.4 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 7.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 7.2 – LP0509 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated - the site is close to Conservation Area boundary and listed buildings.
<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape.

Source: Site Assessment Report – Main Report

## LP0264 site inspection

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7.5 We have inspected the site [externally] see Figure 7.1 Figure 4.3.

**Figure 7.1 - LP0509 site inspection photos**



View of Engenda Manufacturing Plastics unit which is to be demolished and redeveloped for residential (discussed shortly)



Side view of Engenda Manufacturing Plastics Unit with access and hard standing



Side view of Engenda Manufacturing



View of vacant buildings on site (Dewsbury Road) which will be demolished for redeveloped to residential



Mill building converted to residential adjacent to the site off Dewsbury Road



View from Aldi looking down Huddersfield Road to roundabout



Land behind properties fronting Huddersfield Road and access to middle of site

Source: AspinallVerdi

- 7.6 From our site visit, we would agree with the RAG rating that there are potential access issues and this may have been made more challenging as a result of the planning permission granted (off Dewsbury Road).
- 7.7 The two existing access points to the remainder of the site are marked in red on Figure 7.2 and whilst these are used currently, more significant development might require more formalised access but the constraint is their proximity to the roundabout. This will need to be explored as part of any development proposals. As access is currently achieved, we have assumed for the purpose of our assessment that a solution could be found, perhaps further down Dewsbury Road opposite Westbury Street.

**Figure 7.2 - Aerial view of LP0509 and potential access points**



Source: Google Maps

- 7.8 From the site visit, it was difficult to ascertain whether all of the site was in use, but we can confirm the car wash facility off the B6114 was in active use. As shown by the figure above, the external condition and appearance of the existing premises on site are generally of poor quality and would not be suitable for refurbishment or meet modern business requirements. Therefore, if the site is to be developed it would require demolition and redevelopment.
- 7.9 Having reviewed the Land Registry portal, it appears there are numerous titles across the allocation. Excluding the land not subject to the residential planning application, there is approximately 9 separate titles (see Figure 7.3). This would suggest that there is some land assembly required in order to bring forward the remainder of the allocation.

**Figure 7.3 - LP0509 Land Registry Titles**



Source: Land Registry

- 7.10 Despite the constraints of the site in terms of access, existing buildings and land assembly, the site is in a good location very close to Elland High Street. Neighbouring the site to the east is some new build employment facilities which are well occupied and north of the site there is evidence of new build and conversion to residential (we discuss these below). The site is considered suitable for both of these uses given the proximity to Junction 24 of M62 (less than 4 km) and the high street which is less than 100 metre walk away.
- 7.11 It is worth pointing out that the high street was included in the Ministry of Housing, Communities and Local Government's Future High Street Fund which could act as a catalyst for further private sector investment in Elland. Furthermore, there is a proposed new railway station in Elland which will improve connectivity to the wider city region and would make the town an even more attractive place for residents and businesses. This project is being funded by the West Yorkshire Combined Authority and it is currently at Full Business Case stage.

### LP0509 planning history

- 7.12 As stated above, part of the allocation has an implementable planning permission (see Figure 7.4). This relates to 0.582 hectares of the site and the permission secured in February 2019 was outline consent for demolition and redevelopment of the site for 90 residential apartments (155 dwellings per gross hectare) with associated access (Ref: 18/00815/OUT).

**Figure 7.4 - Site plan for planning permission on LP0509**



Source: Calderdale Council Planning Application Portal

- 7.13 The proposed scheme is across 5 floors and the height of the scheme resembles that of the Perseverance Mills (adjacent). The mix proposed is as follows:
- 60 x 47 sqm 1 beds (67%)
  - 30 x 68 sqm 2 beds (33%)
- 7.14 There are no other implementable planning permissions on the wider site (allocation) and no previous applications within the last 5 years.

### LP0509 feasibility studies

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- 7.15 We are not aware of any site feasibility studies or masterplans that have considered this site either as a whole or split following the permission for residential as set out above. As there is land assembly required, it is recommended that once allocated, the Council considers commissioning a study to masterplan the site that takes into consideration the sites constraints and identifies a viable delivery strategy. This document could if necessary, create the evidence base for securing funding for redevelopment.

### LP0509 market evidence and precedents

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- 7.16 In terms of the residential application which has been permitted, there are precedents of this type of development / redevelopment with the Silk Mill apartments and Perseverance Mill being 6-7 storeys.
- 7.17 With regards to the employment uses, we consider there are two developments scenarios possible, one which is B1a led and the other which is B1c. There are examples of modern B1a units neighbouring the site off Dewsbury Road. The scheme includes a mix of B1, B2 and B8 uses but the B1 units are 2-3 storey premises and front onto Dewsbury Road (see Figure 7.5).

**Figure 7.5 - Modern B1a units, Dewsbury Road (Unit 1 & 4 Gannex Park)**



Source: AspinallVerdi

- 7.18 Figure 7.6 shows that unit 1 (left above) totals 556.30 sqm. This is a two-storey property (inclusive of ground floor) meaning the ground floor area will equate to around 283 sqm. This unit is on a parcel of land totalling approximately 0.173 hectares (1,730 sqm), meaning a site coverage of 16% and a development density of 3,215 sqm per hectare.

Figure 7.6 - Layout plan for Units 1-4 Gannex Park



Source: Calderdale Council Planning Portal (Ref: 10/01400/FUL)

- 7.19 Unit 4 is a slightly larger unit totalling 1,328 sqm across three storeys and reflects a site coverage of 15% and a development density of 4,566 sqm per hectare based on a site area of approximately 0.291 hectares.
- 7.20 An alternative scheme to a B1a led development scenario would be B1c-B2 units, akin to the Nano Park scheme in Bradford by Frank Marshall Estates (see Figure 7.7). This is a concept which the developer is looking to roll out across West Yorkshire. The scheme is a hybrid B1c development with the majority of units having a 80 sqm footprint and over 2 storeys totalling 160 sqm. The development has a density of approximately 3,760 sqm per gross hectare (40,475 sqft per gross hectare) and reflects a site coverage of around 19%.

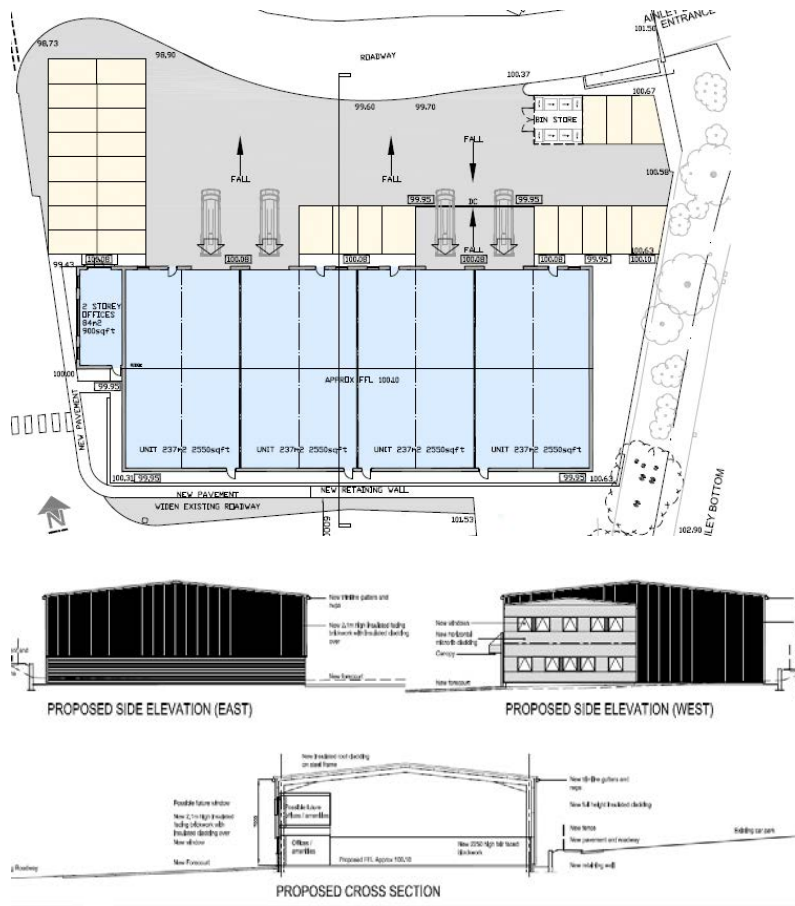
Figure 7.7 – CGI and layout of Nano Park scheme near M606, Bradford



Source: Frank Marshall Estates and City of Bradford Metropolitan Borough Council Planning Portal

- 7.21 A similar scheme to the Nano Park development is planned (Ref: 19/00603/FUL) in Elland on Huddersfield Road and is further evidence of demand for small B1c-B2 units (see Figure 7.8). Full planning permission was granted in August 2019 and the plan below shows a 1,032 sqm scheme B1c and B2 (split into four units) with ancillary offices on 0.279 Ha site.
- 7.22 The height of the industrial buildings is the equivalent of two storeys, but the site sections show they are a single storey unit with the exception of the 84 sqm office. This means the site coverage is higher than Nano Park at 35% but a similar development density of 3,700 sqm per gross hectare.

**Figure 7.8 - Layout plan and site sections for employment precedent in Elland**



Source: Calderdale Council Planning Portal

## LP0509 site capacity assessment

7.23 Taking the above into consideration, Table 7.3 sets out the development capacity assessment in the publication draft compared to our revised assessment.

**Table 7.3 – Summary of site capacity assessment for LP0509**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	1.9	1.9	1.9	
Residential capacity (dwellings)	0	90	90	As per outline planning permission (18/00815/OUT).
Dwellings per hectare	N/A	155	155	Land subject to outline planning permission (18/00815/OUT) totals 0.58 hectares.
Employment capacity (sqm)	4,908	9,760	7,900	The remaining land for employment totals 1.32 hectares. Assuming a site coverage of 20% and a 3 storey development then we consider the site could accommodate 7,900 sqm of B1a floorspace. If a hybrid scheme of B1c-B2 space was delivered then assuming a site coverage of 35% akin to the comparable in Elland, then around 5,000 sqm of space could be accommodated - we assume this would be single storey with a mezzanine office.

Source: AspinallVerdi

## 8 Site LP0573 Mill Royd Street, Brighouse

8.1 Table 8.1 summarises some key background information regarding the site.

**Table 8.1 - LP0573 site information summary**

<b>Address</b>	Land adjacent to Mill Royd Street, Brighouse
<b>Gross area (ha)</b>	2.81
<b>Appropriate planning uses</b>	A, B, C, D and sui generis
<b>Current uses</b>	Primary: Industrial / commercial, retail and vacant land / disused buildings  Secondary: Car parking and public houses
<b>Adjacent land uses</b>	North: River Calder and town centre core  South: River Calder and industrial  East: Residential and parking  West: Residential and Industrial / Commercial
<b>Publication draft status</b>	Not included in the publication draft, this is a new mixed-use allocation

### LP0573 site assessment

8.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 8.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 8.2 – LP0573 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues with no possibility of mitigation
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	Some impact on environmentally sensitive areas which can be mitigated against.

<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

- 8.3 The site assessment report does highlight the challenges with this site in terms of flooding and ecology. These are issues which will have to be fully explored and considered through the planning application process. We discuss below some additional challenges having inspected the site.

### LP0573 site inspection

- 8.4 We have inspected the site see Figure 8.1.

**Figure 8.1 - LP0264 site inspection photos**



View of ROKTFACE climbing wall and The Millers Bar from Daisy Street Car Park



Daisy Street Car Park with ROKTFACE climbing wall in the distance



View of Daisy Street Car Park with retail unit in the background (see right)



View of 1,567 sqft newly refurbished retail unit in Daisy Street Car Park available at £15.95 psf (£25,000 per annum)



SDH Project Services Ltd on Mill Royd Street



R & J Trade Car Outlet on Mill Royd Street



View of S&B Commercial Vehicles on Briggate (A643)



View of Daisy Street Car Park with The Millers Bar behind



View from site towards new Home Group development (discussed below)

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Source: AspinallVerdi

- 8.5 Having inspected the site, it is understandable that this has been identified as an area for regeneration as it has the potential to accommodate a much greater amount of development than it currently does. The site is very well located between the town centre core and train station, acting as a gateway from the south. Currently, the site has a low development density (especially in terms of site coverage) and the nature of existing uses are considered lower value.
- 8.6 The redevelopment of this site requires a holistic approach given the issues around flooding and ecology, but also land ownerships. Figure 8.2 shows that there are a number of registered titles that would need assembling and some unregistered land (north of Mill Royd Street and west of A643) that would need exploring in more detail.

**Figure 8.2 - LP0573 Land Registry Titles**









Source: Land Registry

- 8.7 A further constraint is the number of existing buildings on site and from an external inspection, the majority of these north and south of Mill Royd Street would be demolished if they were to be redeveloped as they either do not lend themselves to an alternative use or do not maximise the development potential of the site.
- 8.8 Despite the site assessment report citing vacant buildings and land, it should be stressed that there are also a number of active businesses in particular west of the A643 but also either side of Mill Royd Street including: ROKT Climbing Gym, R&J (Car outlet and car finance), Quarterbridge Cars, The Millers Bar and Brighthouse Stove Centre. We have not been instructed to explore whether these businesses own the freehold or occupy premises on a leasehold basis. However, understanding this position would be important from a redevelopment perspective as it may have a bearing on deliverability.
- 8.9 Following our inspection, we have identified a number of potential development parcels as shown in Figure 8.3. These are only indicative, but seek to limit the need for land assembly and target areas where a higher development density could be achieved. In our opinion, the most deliverable parcels are those in yellow because they are in Council ownership.

**Figure 8.3 - Potential development parcels on LP0573**



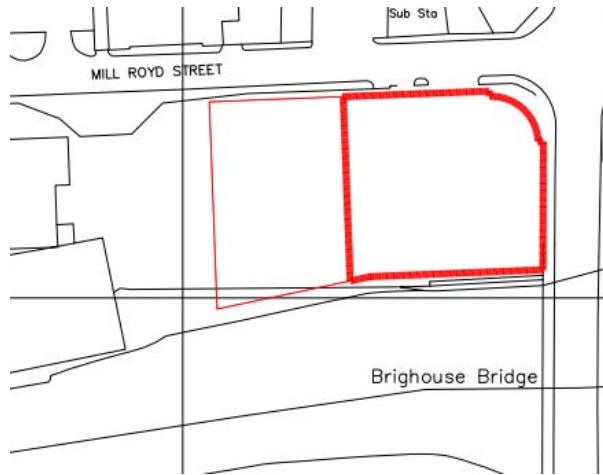
-  10/01563/OUT
-  Development parcel 1
-  Development parcel 2
-  Development parcel 3
-  Development parcel 4
-  Development parcel 5

Source: Google My Maps

### LP0573 planning history

- 8.10 We have reviewed the planning portal and the only significant application relating to the development of the site is a variation to some conditions (20/00626/VAR) on an outline planning application approval secured in May 2013. This indicates the permission has not lapsed.
- 8.11 The outline approval (Ref: 10/01563/OUT) was secured for the demolition of existing garage, and the construction of a four storey building (with surface car park at lower ground floor level) containing a "Class D1" Health Care Centre on the ground, first and second floors, and a "C2" Care Home on the Third Floor comprising 20 beds. A shop (use class A1) associated with the Health Care Centre and ancillary facilities associated with the Care Home also at ground floor level. The site is shown below (in Figure 8.4), south of Mill Royd Street and bounded by the A641 (east).

**Figure 8.4 - Site plan for 10/01563/OUT**



Source: Calderdale Council Planning Portal

### LP0573 feasibility studies

We are not aware of any feasibility studies that have been prepared for this site, although we are aware that Brighouse is on the Ministry of Housing Communities and Local Government Towns Fund programme. Through this process the Council will be identifying projects to secure funding and we would recommend this allocation is considered given the constraints cited and that it is strategically located between the station and town centre. The Towns Fund places an emphasis on clean growth and skills /enterprise. There is an opportunity to address these themes through dealing with the sites constraints as well as the proposed end uses on site.

### LP0573 market evidence and precedents

8.12 Within 200 metres of the site there is an extra-care development (Ref: 17/01343/FUL) on site by Home Group (see Figure 8.5). The scheme includes 65 flats (at 133 dwellings per hectare) with a mix of:

- 42 x 1 bed (65%)
- 23 x 2 beds (35%)

**Figure 8.5 - Home Group Railway Bridge View development**



Source: <https://www.calderdale.gov.uk/v2/residents/housing/upcoming-affordable-housing-schemes#railway>

- 8.13 Another local precedent is Mill Royd Mill opposite the site at the end of Mill Royd Street. This is a conversion and refurbishment to residential but the mill is seven storeys tall which provides a useful indication as to scale of development that would be acceptable on the subject site.

**Figure 8.6 - Mill Royd Mills, Brighouse**



Source: Wikimedia Commons

## LP0573 site capacity assessment

8.14 Taking the above into consideration, Table 8.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 8.3 – Summary of site capacity assessment for LP0573**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	Not included	Not assessed	1.13	Parcel 1: 0.52 hectares Parcel 2: 0.39 hectares Parcel 5: 0.22 hectares
Residential capacity (dwellings)	Not included	200	118	With parcels 3 and 4, we estimate a further 13 dwellings could be delivered. Therefore, to achieve 200 units this would require more comprehensive development across the allocation but we consider there is the land available to achieve the 200 units.  Note that this excludes the 20-bed care home (C2).
Dwellings per hectare	Not included	Not assessed	165	Assuming a slightly higher density than

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
				the Home Group comparable as smaller net developable areas.
Employment capacity (sqm)	Not included	Not assessed	2,741	This is assumed to be B1a on parcel 5 with a site coverage of 50% and a 3-storey development. A more ambitious scheme across 4-storeys could deliver 4,300 sqm (gross) but this is considered to be a large amount of B1 space in Brighouse which is a secondary office location in Calderdale.

Source: AspinallVerdi

## 9 Site LP0579 126-128 Bradford Road, Brighouse

9.1 Table 9.1 summarises some key background information regarding the site.

**Table 9.1 - LP0579 site information summary**

<b>Address</b>	126-128 Bradford Road, Brighouse
<b>Gross area (ha)</b>	0.42
<b>Appropriate planning uses</b>	B1a, C3, D
<b>Current use</b>	Primary: Commercial / industrial Secondary: Leisure (gym)
<b>Adjacent land uses</b>	North: Industrial / commercial and residential South: Community buildings, public services (police) and industrial / commercial East: Industrial / commercial, café (A3) and Clifton Beck West: Residential, retail (A1), public houses (A4) and hot food takeaway (A5)
<b>Publication draft status</b>	2,000 sqm of B floorspace and 60 dwellings

9.2 This site is in a designated primary employment area but the landowner has promoted it for mixed-use allocation with the intention for a conversion scheme to reduce the quantity of employment space. The argument has been made that following the conversion of the former Mill building to offices, warehousing and storage they have been unable to fully let the building after three years of marketing.

### LP0579 site assessment

9.3 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 9.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 9.2 – LP0579 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss/ no impact
<b>Historic Environment RAG</b>	No impact on any heritage asset
<b>Housing Services RAG</b>	Positive – support for mix of uses including housing
<b>Business and Economy RAG</b>	Neutral – retain designation as primary employment area but allocated for mix of uses accepted if includes an element of 'B' uses
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

- 9.4 In summary, the site assessment report concluded that the site should be allocated as a mixed-use site (residential and B1a) as parts of the building remain vacant and are no longer suitable for storage and distribution needs. The landowner has confirmed the availability of the site and viability work indicates that a conversion scheme is more deliverable than a wholly residential new build scheme.

## LP0579 site inspection

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9.5 We have inspected the site [externally] see Figure 9.1.

**Figure 9.1 - LP0579 site inspection photos**



St Pegs Mill 1 from Bradford Road (Realla)



View of the site and entrance from  
Thornhills Beck Lane



View of St Pegs Mill 2 from side



St Pegs Mill from Thornhills Beck Lane

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Source: AspinallVerdi

9.6 From our site visit, we agree with the conclusions of the site assessment report that the site is suitable for a mix of uses and that this would primarily be through conversion of the two mill buildings and demolition of the industrial unit shown below. We have not internally inspected the mill buildings but from our experience locally, we know that internally these are not flexible buildings and are not suitable for storage and distribution primarily due to internal columns and restricted floor to ceiling heights. The mill buildings are considered more appropriate for B1 or indeed conversion to residential. As will be discussed in the planning review section below, part of the mill has been converted to a gym (D2) use. This is another example of how such buildings can be adapted to meet demand.

### LP0579 planning history

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9.7 There are no implementable planning permissions for the site. The most recent planning applications have been for change of use from warehouse space (B8) to gym (D2) at ground and first floor levels (16/00496/FUL) and then the second floor (17/01335/FUL). This shows that the gym operator has required more space than originally planned and was able to secure this due to availability within the building.

### LP0579 feasibility studies

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9.8 We have not been provided with any feasibility studies relating to the site although we understand the quantum of floorspace and residential units proposed at publication draft stage were proposed by the landowner. We would anticipate that some due diligence has been carried out by the landowner in forming this assessment.

### LP0579 market evidence and precedents

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9.9 Conversions of mill buildings to residential are widespread across West Yorkshire and Calderdale in particular. We have referenced a number already in relation to LP0509 and LP0573. In our search of the planning portal, we have also identified a proposal to convert Gatehead Mill, Elland (18/00622/FUL) (see Figure 9.2). Full planning permission has been granted for to 8 residential dwellings with a mix of flats and houses:

- 3 x 2 bed flat
- 1 x 3 bed flat
- 4 x 4 bed houses

**Figure 9.2 - Proposal for Gatehead Mill**



Source: Calderdale Council Planning Portal

## LP0579 site capacity assessment

9.10 Taking the above into consideration, Table 9.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 9.3 – Summary of site capacity assessment for LP0579**

	<b>Publication draft 2018</b>	<b>Housing Supply Update 2020</b>	<b>AspinallVerdi assessment 2020</b>	<b>Comments</b>
Developable area (ha)	0.42	0.42	0.42	
Residential capacity (dwellings)	60	60	60	We do not have any floorplans and area schedules for the existing building and therefore consider the landowner's proposal as justifiable.
Dwellings per hectare	Unknown (conversion)	Unknown (conversion)	Unknown (conversion)	
Employment capacity (sqm)	2,000	2,000	2,000	

Source: AspinallVerdi

## 10 Site LP0749 Stoney Royd Mill & Albion Mills, Halifax

10.1 Table 10.1 summarises some key background information regarding the site.

**Table 10.1 - LP0749 site information summary**

<b>Address</b>	Stoney Royd Mill and Albion Mills, Bailey Hall Road, Halifax
<b>Gross area (ha)</b>	1.52
<b>Appropriate planning uses</b>	B1 and C3
<b>Current use</b>	Primary: Disused / Vacant Buildings Secondary: N/A
<b>Adjacent land uses</b>	North: Industrial / Commercial South: Industrial / Commercial East: Woodland West: Transport
<b>Publication draft status</b>	79 dwellings

### LP0749 site assessment

10.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 10.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 10.2 – LP0749 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Positive

**Business and Economy RAG e**

<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

**LP0749 site inspection**

10.3 We have inspected the site externally see Figure 10.1 Figure 4.3.

**Figure 10.1 - LP0749 site inspection photos**



Land off Berry Lane



Mill buildings elevation



Mill buildings rear elevation



Mechanics Workshop buildings



Mill buildings elevation – Nestle gatehouse

Elevation of Mill buildings looking north east

Source: AspinallVerdi

- 10.4 From our site visit, we confirm that we agree with the site assessment RAG undertaken. The development potential of this area rests mainly within the Nestle buildings which are vacant. New development at the open land adjacent to the Coal Drops is not possible due to a number of constraints.
- 10.5 The mill buildings which are in the ownership of Nestle are vacant and are made up of three attached and interconnected mill buildings which were used for manufacturing processes and storage. To the rear of these buildings is a complex of lower rise buildings referred to as the Mechanics Workshop.
- 10.6 The development opportunity is in the conversion of these buildings for use which could comprise a combination of residential and employment use accommodation. It is likely that the individuals would not be mixed use, as the ground floor may be used for car parking by forming an undercroft. Some small ancillary accommodation may be possible, but this has not been included within this assessment.
- 10.7 The site is located close to the train station and proposal for investment in the train station are progressing. Equally the Town Centre is within walking distance and therefore amenities are accessible for occupants of the buildings.
- 10.8 Detailed feasibility of the potential to convert the buildings needs to be undertaken, to fully explore the configuration, however the depth of the buildings is suited to a variety of uses including employment and residential conversion. Access corridors in the centre of the floorplate can enable units to be created at either side of the building and thus enabling good levels of natural light and ventilation.

- 10.9 The buildings appear in relatively good condition; however, it is acknowledged that conversion costs could be relatively high. This would be subject to detailed survey and design work.

#### LP0749 planning history

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- 10.10 There are no extant planning consents relating to the subject buildings. The search undertaken does identify (as with other sites in this corridor) the proposed A629 Phase Two works which relate to public realm improvements, bus/rail interchange facilities and some highways realignment works.

#### LP0749 feasibility studies

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- 10.11 This site was considered as part of the Eastern Corridor Place Making/ Site Unlocking Study (2017). In this study the site was referred to as the Bailey Hall area. This study confirmed that the land adjacent to the Coal Drops would be very challenging to deliver and therefore did not attribute any development potential.
- 10.12 The Nestle mill buildings were considered for future conversion and re-use and the buildings were inspected at that time. It was found that the mills buildings could be vertically divided and as such enable phased development which could enable risk to be managed.
- 10.13 Two options were considered for the three larger mill buildings which explored either residential as the main use or employment (offices/managed workspace). In these options an element of the ground floor was considered to be suitable for an ancillary retail/leisure or civic use which would provide amenity to people in the locality.

#### LP0749 market evidence and precedents

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- 10.14 Using the approximate floor areas of the buildings it has been possible to calculate the approximate quantum of employment use floorspace and residential units which could be made available. In the table below it has been assumed that the northern most mill building will be utilised for employment use (offices/managed workspace) and the remaining buildings for residential.

## LP0749 site capacity assessment

10.15 Taking the above into consideration, Table 10.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 10.3 – Summary of site capacity assessment for LP0749**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	1.52			
Residential capacity (dwellings)	79	86	56	The number of residential units has reduced as one of the three mill buildings is assumed to be employment use. However, the mechanics workshops were excluded from the earlier analysis and these could be converted along with other buildings in order to provide a combination of mews houses and apartments. A further 7 units could be accommodated.
Dwellings per hectare	n/a			
Employment capacity (sqm)	n/a		1,699	This takes the northern most mill building and provides office accommodation on the upper floors.

Source: AspinallVerdi

## 11 Site LP0771 Firth's Carpets, 432 Bradford Road, Bailiff Bridge

11.1 Table 11.1 summarises some key background information regarding the site.

**Table 11.1 - LP0771 site information summary**

<b>Address</b>	Firths' Carpets, 432 Bradford Road, Bailiff Bridge
<b>Gross area (ha)</b>	0.61
<b>Appropriate planning uses</b>	All A Uses and C3
<b>Current use</b>	Primary: Disused / Vacant Land Secondary: N/A
<b>Adjacent land uses</b>	North: Industrial / Commercial South: Industrial / Commercial, Retail East: Residential West: Public Open Space, Retail
<b>Publication draft status</b>	30 dwellings with mix of use retail, but no indication as to quantum of floorspace

### LP0771 site assessment

11.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 11.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 11.2 – LP0771 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	No impact on any heritage asset

<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigate against
<b>Physical Constraints RAG</b>	Gentle undulations / Gentle slope
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP0771 site inspection

11.3 We have inspected the site [externally] see Figure 11.1.

**Figure 11.1 - LP0771 site inspection photos**



View of site from Wyke Old Lane



View of site from Axminster Drive



View of site from Axminster Drive



Marketing board indicating the site has been sold subject to contract. Board indicates part of the site was pre-let to The Co-Op.



Residential development neighbouring the site – example of mixed scheme incorporating housing and apartments (4 storeys including ground floor)

Source: AspinallVerdi

- 11.4 Having inspected the site, we agree with the site assessment report prepared for the Publication Draft. This is a good development opportunity and mixed-use allocation in single ownership, with main road frontage and limited constraints.
- 11.5 The site does have a slight change in levels but this is not considered to restrict development density and in our view the site could be developed in a number of ways and there is precedent to build up to 4 storeys akin to the adjacent development. We discuss this in more detail shortly.

## LP0771 planning history

- 11.6 The site does have an outline planning application (18/00017/OUT) approved for residential development of 23 dwellings and 18 apartments, a total of 41 dwellings at 67 dwellings per hectare. This was permitted in September 2018 and indicates 11 more dwellings can be accommodated on the site than as assumed at Publication Draft and in the Housing Supply Update 2020.
- 11.7 The layout of the scheme (see Figure 11.2) has apartments in the top corner of the site off Wyke Old Lane with town houses on the southern parcel of land bounded by Bradford Road but with access off Axminster Drive. The plan shows that phase 1 would be the apartments followed by the residential town houses as phase 2.
- 11.8 However, a reserved matters application has been submitted this year under 20/00051/RES; however, this only relates to the 23 dwellings on the phase 2 land. This is currently pending consideration. If approved, it would only leave the northern parcel of land available to accommodate some mix of uses. However, this would be contrary to the outline permission.

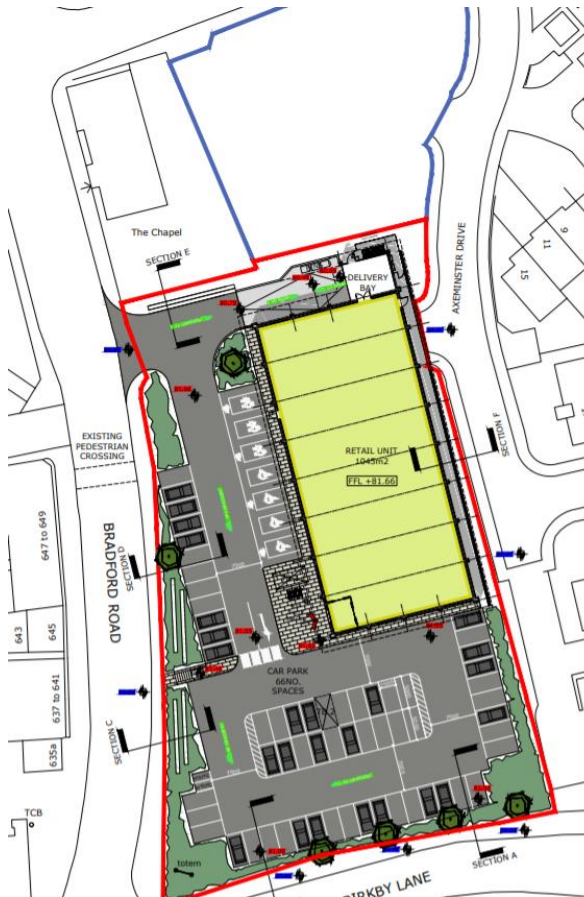
**Figure 11.2 – Layout and phasing plan for proposal 18/00017/OUT**



Source: Calderdale Council Planning Portal

11.9 The site has previously been subject to an application (16/00497/FUL) for retail development which was eventually withdrawn. The application is evidence of how the site could be utilised for a drive-thru retail type development leaving the parcel of land in the corner of the site for residential (see Figure 11.3). This scheme included 1,045 sqm of retail floorspace at a density of 2,312 sqm per gross hectare. Combining this scheme with the apartments shown in the outline permission above, the site could accommodate 1,045 sqm of retail and 18 flats.

**Figure 11.3 - Layout plan for withdrawn retail development**



Source: Calderdale Council Planning Portal

### LP0771 market evidence and precedents

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- 11.10 As the retail led scheme above was withdrawn and the market has returned with a residential development, it indicates a shift away from a potential mix of uses being achieved. In our opinion, the area of the site most suited to retail would be with frontage to Bradford Road. This could take the form of some ancillary retail at the ground floor of a residential apartment block or indeed a more comprehensive retail scheme perhaps accommodating a drive-thru type retailer.
- 11.11 Retailers would be attracted to the visibility and prominence provided by the fronting Bradford Road as this would attract passing trade. Whereas the parcel of land off Wyke Old Lane is set back from the main road and is only likely to capture local demand from residents.
- 11.12 We assess a residential-led scheme with ground floor retail in our capacity assessment below. This is only an indicative assessment and it is important to state that an outline for solely residential has been approved, with a follow up reserved matters. If this scheme complies with development plan policies, then we consider that the site should be allocated for solely residential use as there can be no certainty the market would bring the site forward with a mix of uses.

## LP0771 site capacity assessment

11.13 Taking the above into consideration, Table 11.3 sets out the development capacity assessment in the Publication Draft and Housing Supply Update compared to our own assessment. Where there are differences, we have provided a comment to justify the change. This table does not present the details discussed above in relation to the outline planning permission and live reserved matters application that indicates 41 dwellings and no employment or retail space. A decision needs to be made as to whether the site is allocated as mixed-use or residential in order to address the Inspector's question under Matter 14.

**Table 11.3 – Summary of site capacity assessment for LP0771**

	Publication draft 2018	Housing supply update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	0.61	0.61	0.55	We have assumed a 90% gross to net ratio from the gross site area of 0.61 ha
Residential capacity (dwellings)	30	30	30	21 residential dwellings at 40 dph and 9 flats above ground floor retail.
Dwellings per hectare	55	55	54	The density is slightly lower than the outline planning permission at 67 dph as a result of retail at the ground floor of the apartment block.
Employment capacity (sqm)	0	0	0	
Retail capacity (sqm)	0	0	250	This is an indicative net floor area at the ground floor of a 1,080 sqm building (over 3 storeys).

Source: AspinallVerdi

## 12 Site LP0922 Former Fire Station, Hebden Bridge

12.1 Table 12.1 summarises some key background information regarding the site.

**Table 12.1 - LP0922 site information summary**

<b>Address</b>	Former Hebden Bridge Fire Station, Valley Road, Hebden Bridge, HX7 7BY
<b>Gross area (ha)</b>	0.37
<b>Appropriate planning uses</b>	B1a, C3
<b>Current use</b>	Primary: Disused / Vacant Land, Industrial / Commercial, Transport
<b>Adjacent land uses</b>	North: Residential South: Community Buildings, Retail East: Retail West: Residential
<b>Publication draft status</b>	2,200 sqm of B1 floorspace and 11 dwellings

### LP0922 site assessment

12.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 12.2 we provide a summary of the site assessment undertaken to support the Publication Draft plan.

**Table 12.2 – LP0922 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	Some impact on environmentally sensitive areas which can be mitigated against
<b>Open Space RAG</b>	Some loss which is not required or can be replaced elsewhere

<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Outside MSA or with buffer
<b>Environmental Health RAG</b>	There is no detrimental effect
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP0922 site inspection

12.3 We have inspected the site [externally] see Figure 12.1.

**Figure 12.1 - LP0922 site inspection photos**



Looking south across Market Place



Telephone exchange



Looking north to Market Place



Across Valley Road looking east



Pennine Industrial Park - opposite



Commercial mixed-use opposite

Source: AspinallVerdi

- 12.4 From our site inspection, we confirm that we agree with the site assessment RAG undertaken. The site is in separate ownerships and the telephone exchange site is separated from the other land parcels are separated by an access road. The site is within the centre of Hebden Bridge and thus enjoys accessibility and benefits from the amenities provided.
- 12.5 The sites are very close to adjacent buildings which comprise a mix of uses which include employment, residential and retail. Adjacent development is generally three storeys in height.
- 12.6 The presence of Listed buildings and a Conservation Area will mean that the design of the proposed development will need to be carefully developed in order that an attractive development takes place.
- 12.7 The telephone exchange will need to be demolished (the status of the use of this building is not known).
- 12.8 The MIQ's raised the question of the impact of loss of car parking. It should be noted that the car parking taking place at the site of the former fire station was allowed temporarily and this has expired. The public car parking will be lost however alternative car parking is available within Hebden Bridge and which will thus reduce cars driving into the heart of the Town Centre.

### LP0922 planning history

- 12.9 A search for planning history identifies that an application was made in 2017 to use the site of the former fire station as a temporary car park (17/00238/TEM). This was granted for a period of three years.
- 12.10 In addition, an application was made by the Council in respect of the demolition of the public conveniences at the site (20/80001/DNO). From our site inspection this has not yet been implemented and the structure is at the site.

### LP0922 feasibility studies

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12.11 No feasibility studies have been undertaken for this site.

### LP0922 market evidence and precedents

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- 12.12 The town centre location and surrounding buildings set precedents for future development. The site is surrounded by a vibrant mix of uses with retail, residential and commercial spaces. It is clear that any commercial development is likely to be multi-let and as such will need to be designed to provide smaller divisible units.
- 12.13 We have made an assessment which is based on site coverage and either 2 or 3 storey development in respect of each of the three sites. There may be potential for additional height to four storeys, especially for residential use (assuming apartments) however this has not been assumed.
- 12.14 Two scenarios have been considered, a residential led scenario which increases the number of residential units to 21 and the employment use is reduced to 977sqm. However, we present below an assessment which presents an employment led solution.

## LP0922 site capacity assessment

12.15 Taking the above into consideration, Table 4.4 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 12.3 – Summary of site capacity assessment for LP0922**

	Publication draft 2018	Housing supply update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	0.37	0.37	0.37	
Residential capacity (dwellings)	11	11	12	Based on an assessment of the quantum of accommodation which can be provided at the site with an average unit size of 90sqm (equivalent to a 3 bedroomed dwelling).
Dwellings per hectare	29.7	29.7	32.4	Based on the overall area of the combined sites.
Employment capacity (sqm)	2,220	2,220	2,213	Assessment of the quantum of 2 and 3 storey accommodation at the sites (former fire station and market place). We have assumed a site coverage of 50%.

Source: AspinallVerdi

## 13 Site LP1088 West Vale Works, Stainland Road, West Vale

13.1 Table 13.1 summarises some key background information regarding the site.

**Table 13.1 - LP1088 site information summary**

<b>Address</b>	West Vale Works, Stainland Road, West Vale, Elland, HX4 8BB
<b>Gross area (ha)</b>	0.80
<b>Appropriate planning uses</b>	B1a, C3
<b>Current use</b>	Primary: Industrial / Commercial, Residential Secondary: n/a
<b>Adjacent land uses</b>	North: Sports / Recreation Facility South: Residential East: Industrial / Commercial, Residential West: Industrial / Commercial
<b>Publication draft status</b>	3,660 sqm of B1 floorspace and 14 dwellings

### LP1088 site assessment

13.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 13.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 13.2 – LP1088 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	No significant impact on the road network
<b>Ecology RAG</b>	Some impact on environmentally sensitive areas which can be mitigated against
<b>Open Space RAG</b>	No loss / No impact

<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Outside MSA or with buffer
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigate against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP1088 site inspection

13.3 We have inspected the site [externally] see Figure 4.3.

**Figure 13.1 - LP1088 site inspection photos**



View of the site from Saddleworth Road



View of the site from Saddleworth Road



View down Saddleworth Road with site on the right-hand side

Source: AspinalVerdi

- 13.4 The site previously had a series of buildings on it, including a large mill that fronted Stainland Road (see Figure 13.2). However, having inspected the site these have been cleared leaving a brick wall along the front of Stainland Road. The site is relatively flat, however there is a change in levels from Stainland Road down to Saddleworth Road.

**Figure 13.2 - Historical aerial view of LP1088**



Source: Google

13.5 The site is located at a major crossroads in West Vale where Saddleworth Road meets Stainland Road. These link West Vale with the M62, Elland and Halifax. Stainland Road runs through the town centre of West Vale and is where the majority of retail floorspace is accommodated in the town, including Co-Op Food and Tesco Express.

### LP1088 planning history

13.6 There is a live application on the site for full planning permission for a retirement living scheme with care (Ref: 18/01189/FUL). The proposal is for 67 apartments at 120 dwellings per net hectare with a mix of accommodation as follows:

- 23 x 1 bed (34%)
- 37 x 2 bed (55%)
- 7 x 3 bed (11%)

**Figure 13.3 - Layout plan for proposed scheme at LP1088**



Source: Calderdale Council Planning Portal

13.7 Other than the above application by Adlington, there have been no other planning applications in the last 5 years.

### LP1088 feasibility studies

13.8 Other than the work undertaken in relation to the above planning application, we are not aware of any other feasibility studies that have been carried out with regards to the site to explore its potential development.

## LP1088 market evidence and precedents

- 13.9 The site was designated as a primary employment area in the Replacement Unitary Development Plan and was advocated as a potential mixed-use allocation in the employment land study. From a review of the sites planning history, it does not appear that any employment-led scheme has been forthcoming and the market has now come forward with a retirement living scheme on the site. A residential-led development is considered the most likely solution to the site as it will generate the highest land value in this location.
- 13.10 We have looked at the site from the perspective of trying to secure a greater mix of uses on the site. The proximity of Co-Op Food and Tesco Express to the site, rules out the potential for any further convenience retail floorspace and comparison retail is not considered appropriate as the site is not in the town centre boundary. We understand from the planning portal that there may be an aspiration from the local community for the site to provide some leisure or community uses. However, without an end user or operator identified then delivering such uses will be challenging as they do not generate much value.
- 13.11 Therefore, in our assessment we have looked at splitting the site into two with employment on the land off Saddleworth Road (red shading) and residential on Stainland Road (blue shading).

**Figure 13.4 - Potential site configuration**



Source: Google My Maps

- 13.12 In our opinion, the nature of the employment uses would be B1c-B2 akin to the types of development discussed in relation to LP0509. The site is only around 6.4 kilometres from Junction 24 of the M62 but also has good connectivity to Halifax via the A629.

## LP1088 site capacity assessment

13.13 Taking the above into consideration, Table 13.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change. It should be stressed that this ignores the current live planning application where 67 apartments are proposed.

**Table 13.3 – Summary of site capacity assessment for LP1088**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	0.47	0.47	0.64	Larger area but lower site coverage for employment use than previously used.
Residential capacity (dwellings)	14	14	12	0.282 hectares of land fronting Stainland Road identified. Assuming 95% gross to net ratio and applying 45 dwellings per hectare we believe 12 units are possible.
Dwellings per hectare	45	45	45	
Employment capacity (sqm)	2,820	2,820	1,428	On the remaining 0.357 hectares of land, we have assumed a site coverage of 20% and a two-storey development to get to the 1,428 sqm of floorspace shown. This equates to 4,000 sqm per hectare and is more in line with local precedents than a 35% site coverage.

Source: AspinallVerdi

## 14 Site LP1123 Kinnaird Close, Elland

14.1 Table 14.1 Table 4.1 summarises some key background information regarding the site.

**Table 14.1 - LP1123 site information summary**

<b>Address</b>	Kinnaird Close, Elland
<b>Gross area (ha)</b>	1.73
<b>Appropriate planning uses</b>	B1, C3
<b>Current use</b>	Primary: Disused / Vacant Land Secondary: n/a
<b>Adjacent land uses</b>	North: Agriculture South: Industrial / Commercial East: Heritage Asset West: Residential
<b>Publication draft status</b>	6,920 sqm of B1 floorspace and 38 dwellings

### LP1123 site assessment

14.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 14.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 14.2 – LP1123 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	No impact on any heritage asset
<b>Housing Services RAG</b>	Positive

<b>Business and Economy RAG</b>	Neutral
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP1123 site inspection

14.3 We have inspected the site [externally] see Figure 14.1.

**Figure 14.1 - LP1123 site inspection photos**



Mill building fronting Park Road



Site access from Park Road



Access to Kinnaird Close



View of site from Kinnaird Close



View down Kinnaird Close



Entrance to the rear of the site



Car parking and hard standing at rear of the site



Land neighbouring subject site with permission for 2 x semi-detached properties



Aerial view of the site using Google Maps

Source: AspinalVerdi

- 14.4 The site is located north of the A629 off Park Road, which is on the northern fringe of Elland. The A629 and the Calder and Hebble Navigation act as physical barriers that cut the site off from the town centre. However, as stated earlier there is a proposal for a new train station in Elland and this would improve the accessibility and attractiveness of this site (see Figure 14.2). Regardless of this proposal, the area surrounding the site is an active employment location with Lowfields Business Park and from our inspection it appears that V Seal and Hilclare Technology still occupy some of the premises on site.

**Figure 14.2 - Proposed location of Elland Station**



Source: Google

- 14.5 The site has been densely developed with only the land at the rear used for parking and limited opportunity for turning larger vehicles. The access to the industrial units is currently constrained to three narrow routes off Park Road with residential on at least one side. With the exception of the mill building fronting Park Road, we would expect the remaining single storey buildings would be demolished before any redevelopment in order to meet modern requirements and reduce the density of the site.
- 14.6 From a review of the Land Registry, we would highlight that the allocation appears to be unregistered land. We understand the Council has engaged with the landowner but we would recommend clarifying the ownership status.



14.10 In our opinion, the rear of the site is where the residential should be located if the site is redeveloped for a mix of uses. This would provide some continuity from the residential north of Woodlands Road and the properties would benefit from the nicer aspect at the rear of the site with the employment uses utilising the better access directly off Park Road.

**Figure 14.4 - Location plan of LP1123**



Source: Google My Maps

## LP1123 site capacity assessment

14.11 Taking the above into consideration, Table 14.3 sets out the development capacity assessment in the publication draft and housing supply update compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 14.3 – Summary of site capacity assessment for LP1123**

	Publication draft 2018	Housing supply update 2020	AspinallVerdi assessment 2020	Comments
Developable area (ha)	1.42	1.42	1.42	Reflects a gross to net ratio of 82%
Residential capacity (dwellings)	38	38	68 or 60	At the publication draft stage, it was assumed that the site would be split into 50% employment and 50% residential. The employment was based on a 40% plot ratio with 2 storeys of B1 development. The residential is based on 44 dwellings per hectare. These are considered reasonable assumptions having assessed the site ourselves and we understand the landowner is happy with this assessment. However, should there be an aspiration to increase the residential density then we consider that converting the Park Road Mills into flats could provide around 29 dwellings with a further 39 dwellings at the rear of the site assuming 44 dwellings per hectare. This reduces the B floorspace to 4,300 sqm.
Dwellings per hectare	44	44	44	
Employment capacity (sqm)	6,920	6,920	4,300 or 5,088	

Source: AspinallVerdi

## 15 Site LP1170 Mulcture Hall Road, Halifax

15.1 Table 15.1 summarises some key background information regarding the site.

**Table 15.1 - LP1170 site information summary**

<b>Address</b>	Mulcture Hall Road, Halifax
<b>Gross area (ha)</b>	3.24
<b>Appropriate planning uses</b>	B1, C3
<b>Current use</b>	Primary: Disused / Vacant Land Secondary: Community Buildings, Retail
<b>Adjacent land uses</b>	North: Industrial / Commercial South: Community Buildings, Retail East: Transport, Woodland West: Industrial / Commercial
<b>Publication draft status</b>	3,000 sqm of B1 Floorspace and 42 dwellings

### LP1170 site assessment

15.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 15.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 15.2 – LP1170 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	Some impact on environmentally sensitive areas which can be mitigated against
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated

<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigate against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

- 15.3 We note from the MIQs that there is a question regarding an “ecology-related buffer zone adjoining Hebble Brook?”. In the assessment below account has been taken of the Hebble Brook and buffer zone.

#### LP1170 site inspection

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- 15.4 We have inspected the site [externally] see Figure 15.1.

**Figure 15.1 - LP1170 site inspection photos**



Existing access to site



Look across north of site



Looking east across the site



Looking south Mulcture Hall Road

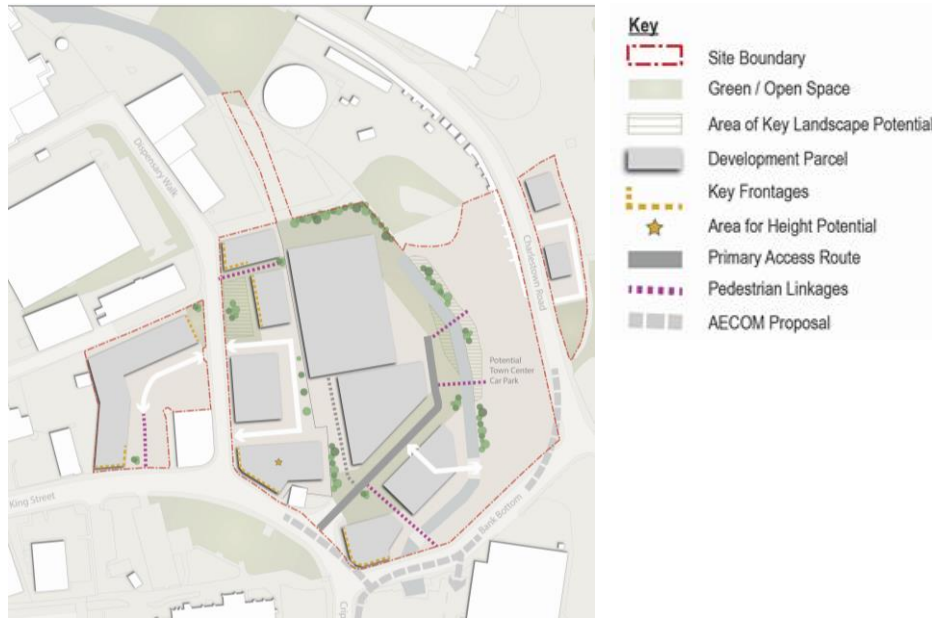
Source: AspinallVerdi

- 15.5 From our site assessment, we confirm that we agree with the site assessment RAG undertaken. There are a number of constraints which will need to be fully explored in terms of the detailed design and layout of the site for future development.
- 15.6 The site is relatively flat and is close to the Town Centre and rail station. The site could be suitable for a wide range of uses including residential and employment use. Whilst there are some neighbouring employment uses, the site is of sufficient scale that it could create an attractive setting for residential development which would be accessible by foot to the Town Centre and other amenities.

### LP1170 feasibility studies

- 15.7 This site was considered as part of the Eastern Corridor Place Making/ Site Unlocking Study (2017). As mentioned under LP0264 above this site was considered together with the Well Lane/King Street site and referred to as the Cripplegate site.
- 15.8 The study considered the constraints relating to the site and established the development parcels which could be brought forward at the site. We reproduce the indicative plan below.

Figure 15.2 - Indicative layout plan of LP1170

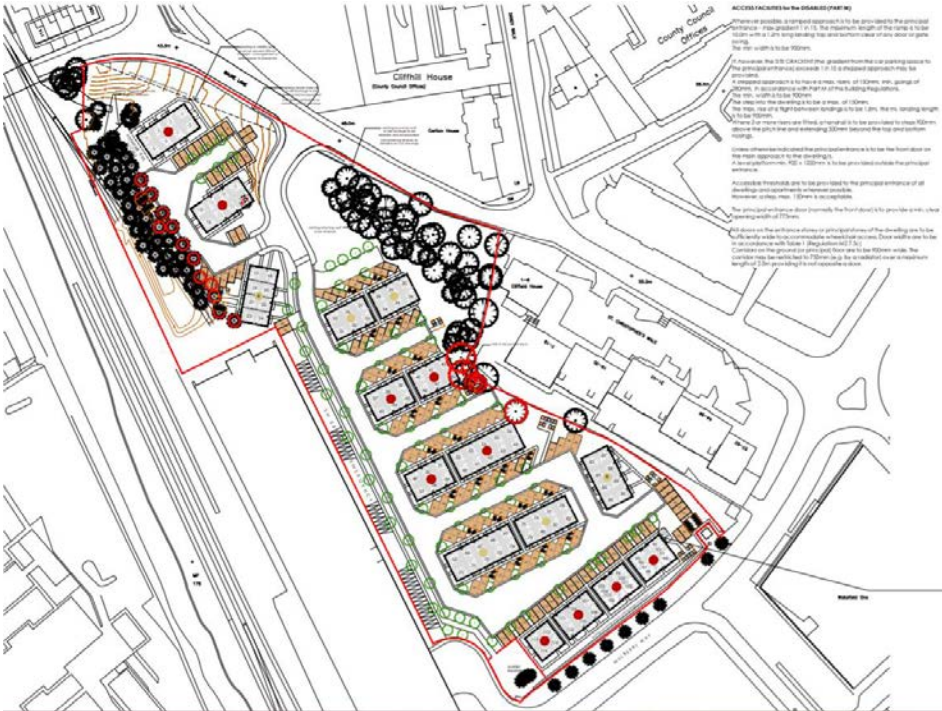


Source: AspinallVerdi – Eastern Corridor Place Making/Site Unlocking Study

### LP1170 market evidence and precedents

- 15.9 The MIQs raised the question of the reason for the proposed increase in dwellings from 42 to 121. In the following assessment it is made clear how a re-assessment of the site has been undertaken and that this results in revised housing and employment numbers.
- 15.10 The given the location of the site and the nature of the Halifax property market it is considered that in residential development terms the site could be suited to a contemporary form of high density, but low-rise development which is aimed at smaller households. Schemes such as the Flaunt and Agenda residential schemes developed by Strata Homes provide useful precedents on similar sustainably located sites on edge of centre locations.
- 15.11 We provide below a plan of the Agenda scheme which has been developed in Wakefield, in close proximity to Wakefield Westgate Station. The site extends to approximately 1.35 Ha and provides 116 two-bedroomed houses which are arranged over three floors. The density is achieved partly through the 'back to back' arrangement of 8 units in a block. The density of this development is therefore in the order of 86 units per hectare.

Figure 15.3 - Plan of Strata precedent



Source: Wakefield Council Planning Portal

15.12 In terms of employment use accommodation we would consider that either single storey terraced light industrial or warehouse accommodation is provided as this is likely to appeal to the market place, or alternatively hybrid units (such as the Nano Park units discussed under LP059) which provide accommodation over two floors, but are very flexible in terms of the workspace provided.

## LP1170 site capacity assessment

15.13 Taking the above into consideration, Table 15.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. It can be seen that a significant proportion of the site has not been considered for development, partly due to the need to buffer the Hebble Brook, but also excluding undevelopable parts of the site.

**Table 15.3 – Summary of site capacity assessment for LP1170**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
<b>Developable area (ha)</b>	3.24 Ha (gross)		1.87 Ha (net)	Developable area reflects a reduction due to the identification of development constraints.
<b>Residential capacity (dwellings)</b>	42	121	131	Based on an application of a density of 86 dph – similar to that of the precedent Strata scheme.
<b>Dwellings per hectare</b>	n/a	n/a	86	
<b>Employment capacity (sqm)</b>	3,000	3,000	2,630	Based on two storey hybrid units.

Source: AspinallVerdi

## 16 Site LP1431 Former Mayfield Garage, Queens Road, Halifax

16.1 Table 16.1 summarises some key background information regarding the site.

**Table 16.1 - LP1431 site information summary**

<b>Address</b>	Former Mayfield Garage, Queens Road, Halifax
<b>Gross area (ha)</b>	0.87
<b>Appropriate planning uses</b>	A1, B1/B2 and D
<b>Current use</b>	Primary: Disused / Vacant Buildings Secondary: Disused / Vacant Land
<b>Adjacent land uses</b>	North: Residential South: Disused / Vacant Land, Residential East: Industrial / Commercial, Residential West: Residential
<b>Publication draft status</b>	3,480 sqm of B1 Floorspace and 17 dwellings

### LP1431 site assessment

16.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 16.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 16.2 – LP1431 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	No access issues
<b>Local Road Network RAG</b>	No significant impact on the road network
<b>Ecology RAG</b>	No impact on environmentally sensitive areas
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	No impact on the any heritage asset
<b>Housing Services RAG</b>	Positive

<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Outside MSA or with buffer
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP1431 site inspection

16.3 We have inspected the site [externally] see Figure 16.1 Figure 4.3.

**Figure 16.1 - LP1431 site inspection photos**



West across Queens Road



Across Queens Road north



Marketing board



Residential development Vickerman Street



Residential immediately to north



North along Queen Street

Source: AspinallVerdi

- 16.4 From our site assessment, we confirm that we agree with the site assessment RAG undertaken. The site is surrounded with a wide range of uses including residential, employment and retail.
- 16.5 The site is currently not utilised, most buildings have been demolished although there are a few structures which would need to be demolished. To the west of the site is a contemporary residential development along Vickerman Street, which provides a useful precedent in terms of the nature of housing which could potentially be brought forward at this site.
- 16.6 Equally immediately to the north of this site there is a housing development which we believe provides apartments within 3 two storey blocks.
- 16.7 Queens Road is a busy road with a number of commercial uses along this frontage.
- 16.8 The site is suitable for mixed use development. This could comprise commercial and workspace uses to the Queens Road frontage. To the rear of this development we consider that there is potential to divide the site such that the site could be developed with residential use which could be separated with an access road.

#### LP1431 planning history

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- 16.9 No planning applications have been made at this site within the last five years.

#### LP1431 feasibility studies

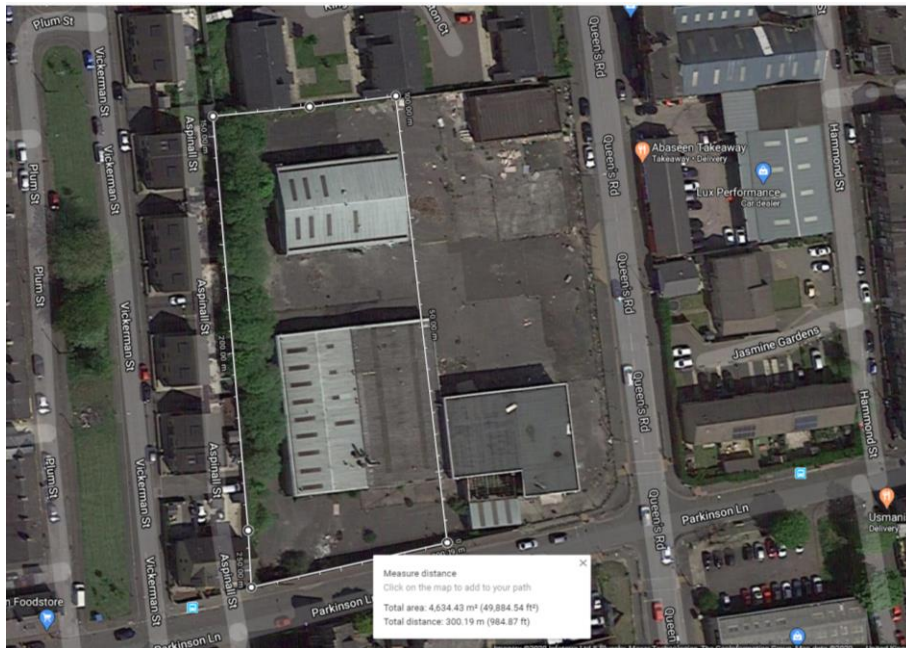
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- 16.10 There have been no feasibility studies undertaken for this site by Calderdale Council.

## LP1431 market evidence and precedents

- 16.11 Whilst Queens Road is a busy mixed-use area, adjacent to the site are a range of housing developments which indicate that relatively high-density low-rise housing could be suitable. Such housing could be in the form of town houses and these could be parallel to the existing housing along Vickerman Street, with access from Parkinson Lane which is to the south of the site.
- 16.12 We provide below a plan indicating the site area which we have assumed could be given over for residential development at this site. The area outlined below has an approximately land area of 0.47 Ha. We have scaled the overall area of the site to be 0.87 Ha, this means that approximately 0.4Ha are available for employment use development.

**Figure 16.2 - Plan showing indicative land area for residential development**



Google Maps/ AspinallVerdi

## LP1431 site capacity assessment

16.13 Taking the above into consideration, Table 16.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 16.3 – Summary of site capacity assessment for LP1431**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
<b>Developable area (ha)</b>	0.87	0.87	0.87	This is the overall area. As mentioned above the area attributed to residential development is approximately 0.47Ha.
<b>Residential capacity (dwellings)</b>	17	17	17	Based on dividing the site into two such that a separate residential development plot can be created and that this is developed out a density of 36 dwph.
<b>Dwellings per hectare</b>	36	36	36	
<b>Employment capacity (sqm)</b>	3,480	3,480	3,480	The commercial uses will be delivered to the frontage to Queens Road. This could be in the form of B1c or B2 units which could also be terraced to provide efficient smaller units aimed at SME's.

Source: AspinallVerdi

## 17 Site LP1622 Top Land, Cragg Vale

17.1 Table 17.1 summarises some key background information regarding the site.

**Table 17.1 – LP1622 site information summary**

<b>Address</b>	Top Land, Cragg Vale, Hebden Bridge, HX7 5RW
<b>Gross area (ha)</b>	8.38 Ha (6.3 Ha developable)
<b>Appropriate planning uses</b>	B/C Live Work Units
<b>Current use</b>	Primary: Agricultural Secondary: Industrial /Commercial
<b>Adjacent land uses</b>	North: Residential South: Agricultural East: Scrubland West: Woodland
<b>Publication draft status</b>	29,330 sqm B1/B2 but no indication into residential

### LP1622 site assessment

17.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 17.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 17.2 – LP1622 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	Some impact on environmentally sensitive areas which can be mitigated against
<b>Open Space RAG</b>	Some loss which is not required or can be replaced elsewhere
<b>Historic Environment RAG</b>	Some impact which could be mitigated
<b>Housing Services RAG</b>	Neutral

<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Gentle undulations/Gentle Slope
<b>Landscape RAG</b>	Significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP1622 site inspection

17.3 We have inspected the site see Figure 17.1Figure 4.3.

**Figure 17.1 – LP1622 site inspection photos**



Subject Site in Middle Distance



Tenant Board of Occupiers



Looking across the site



Looking across the site

Source: AspinallVerdi

- 17.4 Since the preparation of the site assessment, the landowners and their agents have come forwards with representations to the Council. In summary they are concerned with the residential proposal for the following reasons
- There is good demand for commercial accommodation; the applicants claim that demand outstrips supply
  - Security/ lack of an alternative (separate) access. The site is locked and secure out of hours and they consider that this is important to their tenants. Therefore, mixing with residential may be problematic.
  - Site constraints – they have highlighted a habitat zone and power lines which could affect future development
  - Incompatibility of uses – they consider that there may be conflicts between uses/occupiers of the business park and the commercial occupiers. Also, they consider that selling off freehold interests could make future management complex.
  - They consider that the number of houses would affect the amount of employment which could be provided; and that they consider that the amount of employment floorspace that can be provided has been over estimated.
- 17.5 The site inspection confirms that the site is secure with electrically operated gates and that the current accommodation is set away from the surrounding residential uses. The access which is closest to the settlement is generally closed off and, in any event, could not accommodate additional traffic due to very narrow highway widths. The implication of this is that the site can only be meaningfully accessed from Cragg Road and thus any proposed residential development would pass through the employment site and potential generate conflicts between users.
- 17.6 We can confirm that the site is well occupied with a range of units and operators with ancillary facilities which support the employment use (e.g. catering and nursery).

#### LP1622 planning history

- 17.7 A search has not revealed any extant planning permissions or applications.

## LP1622 feasibility studies

17.8 The landowners and their agents have provided the following drawing which indicates their employment use development proposals. Whilst these are not committed nor have a planning permission it can be seen that the site provides approximately 8,314 sqm of accommodation.

**Figure 17.2 - Proposals for LP1622**



Source: Calderdale Council

## LP1622 market evidence and precedents

17.9 Given the representations made by the landowners, it is considered that the site cannot accommodate additional housing units within the proposed allocation. It must also be noted that the level of employment use accommodation that is being proposed is less than the 10,000 sqm, envisaged by the Council. We would consider that there may be some potential to achieve 10,000 sqm through some intensification using upper floor accommodation at some of the units, particularly those in the lower part of the site where the impact will be minimal. Such upper floor intensification may also contribute to greater financial viability through greater development being delivered across the site.

## LP1622 site capacity assessment

17.10 Taking the above into consideration, Table 17.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 17.3 – Summary of site capacity assessment for LP1622**

	Publication draft 2018	Housing Supply Update 2020	AspinallVerdi assessment 2020	Comments
<b>Developable area (ha)</b>	6.3	6.3	6.3	
<b>Residential capacity (dwellings)</b>	0	50	0	Due to the restricted access and security measures that commercial occupiers currently enjoy, it is considered that it will not be possible to include residential development within this site.
<b>Dwellings per hectare</b>	-	-	-	
<b>Employment capacity (sqm)</b>	29,830	29,830	10,000	The applicant's proposal suggests capacity for 8,300 sqm, however it is considered that some intensification could potentially occur, particularly with an additional storey added to some of the buildings.

Source: AspinallVerdi

## 18 Site LP1632 Horton Street, Halifax

18.1 Table 18.1 summarises some key background information regarding the site.

**Table 18.1 - LP1632 site information summary**

<b>Address</b>	Land at Horton Street, Halifax
<b>Gross area (ha)</b>	1.56
<b>Appropriate planning uses</b>	, C3 and D
<b>Current use</b>	Primary: Disused / Vacant Buildings, Retail Secondary: Disused / Vacant Land, Transport
<b>Adjacent land uses</b>	North: Industrial / Commercial South: Residential East: Industrial / Commercial, Transport West: Residential
<b>Publication draft status</b>	4,680 sqm of B1 Floorspace and 47 dwellings

### LP1632 site assessment

18.2 To assess the development potential of the site, we have firstly reviewed any existing information that has been prepared in relation to the development of the site. In Table 18.2 we provide a summary of the site assessment undertaken to support the publication draft plan.

**Table 18.2 – LP1632 site assessment report summary**

<b>Flooding RAG</b>	Flooding issues which can be mitigated
<b>Strategic Road Network RAG</b>	No significant impact on the road network
<b>Site Access RAG</b>	Potential access issues which are resolvable
<b>Local Road Network RAG</b>	Impact on the road network requiring mitigation
<b>Ecology RAG</b>	Some impact on environmentally sensitive areas which can be mitigated against
<b>Open Space RAG</b>	No loss / No impact
<b>Historic Environment RAG</b>	Some impact which could be mitigated

<b>Housing Services RAG</b>	Positive
<b>Business and Economy RAG</b>	Positive
<b>Minerals RAG</b>	Within MSA
<b>Environmental Health RAG</b>	There is no significant detrimental effect that cannot be mitigated against
<b>Physical Constraints RAG</b>	Relatively flat
<b>Landscape RAG</b>	No significant harm on the landscape

Source: Site Assessment Report – Main Report

### LP1632 site inspection

18.3 We have inspected the site [externally] see Figure 18.1.

**Figure 18.1 - LP1632 site inspection photos**



Looking West and North



Empty units New Road



Across New Road towards Deal Street



Across New Road Car Park



Apartment Scheme New Road



Looking east across the site

Source: AspinallVerdi

- 18.4 From our site assessment, we confirm that we agree with the site assessment RAG undertaken. The site is well located at the edge of the Town Centre, with prominence to the A629. A number of constraints were identified; however, we would consider that these can be overcome with a well-designed scheme. The site is brownfield and will require some site preparation work.
- 18.5 The site is sloping downwards from the west to the east. Development is likely to require some elements of site assembly, although the site has sufficiently sized parcels that elements could potentially be developed independently.
- 18.6 The more modern retail parade is unlikely to come forwards for redevelopment in the short-term given the value that these units have at the present time. However, there are a number of older vacant and derelict buildings which need to be assembled in order that they can be cleared.
- 18.7 We understand that the properties on Deal Street are Listed and that these will need to be refurbished comprehensively and this is likely to require some funding support. These properties would appear to be suitable for conversion to both residential or commercial use as they are not substantial floorspace.

### LP1632 planning history

- 18.8 The site is within a Conservation Area and as mentioned above there are listed buildings which will also need to be addressed. We understand that a planning application was made for the 'redevelopment of Pennine Shopping Centre' for retail A3/A4 uses and a 'mindful to permit' decision was made in 2017, however a legal agreement has not been signed.
- 18.9 We also note that a planning application was made in 2019 for the conversion of the Deal Street buildings for 12 residential apartments. This application was withdrawn.

### LP1632 feasibility studies

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- 18.10 This site was considered as part of the Eastern Corridor Place Making/ Site Unlocking Study (2017). The site was considered for its development potential, it was referred to as the Royal London Development Area. It should be stressed that Royal London have no interest in this site.
- 18.11 The site was considered for a range of uses including residential, retail, leisure, managed workspace and light industrial. These uses formed an options assessment of a range of development parcels (4 no.) and uses.

### LP1632 market evidence and precedents

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- 18.12 This is a complex site and it is considered that it can be brought forward with a number of different uses across the various parcels. The sloping levels across the site would suggest that the site would need to be brought forward in parcels which create a series of development platforms.
- 18.13 The site is surrounded with a wide range of uses including employment, residential, retail and leisure and therefore it is clear that a number of separate uses could be accommodated.
- 18.14 Across New Road is a relatively modern development known as Wellington Point which is a 3-storey development of 20 apartments which have been sold. Using the levels at the site the scheme provides 12 basement car spaces. We consider that this provides a useful nearby precedent of the nature of development that could take place at this site.

**Figure 18.2 - Wellington Point precedent image**



Source: St Robert's Homes

## LP1632 site capacity assessment

18.15 Taking the above into consideration, Table 18.3 sets out the development capacity assessment in the publication draft compared to our revised assessment. Where there are differences, we have provided a comment to justify the change.

**Table 18.3 – Summary of site capacity assessment for LP1632**

	<b>Publication draft 2018</b>	<b>Housing Supply Update 2020</b>	<b>AspinallVerdi assessment 2020</b>	<b>Comments</b>
<b>Developable area (ha)</b>	1.56	1.56	1.56	Overall site area.
<b>Residential capacity (dwellings)</b>	47	126	97	Based on an assessment of the amount of accommodation which can be constructed in buildings of 2 or 3 storeys to reflect the challenge in terms of delivery/viability.
<b>Dwellings per hectare</b>				
<b>Employment capacity (sqm)</b>	4,680	4,680	2,945	Based on the assessment on the conversion of some of the existing buildings (Kwik Fit and Deal Street).

Source: AspinallVerdi

## 19 Funding

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- 19.1 Comments have been made with respect to the delivery of sites across the Borough. The issues around this are recognised by the Council and work is on-going to unlock sites through the securing of funding support.
- 19.2 There are a number of funding sources which we consider that the Council can consider and we set some of these below
- **Towns Fund** – MHCLG have selected over 101 locations across the Country to bid for up to £25m in order to support growth in their centres. In Calderdale Brighouse and Todmorden have been selected as towns which can prepare bids.
  - **Shared Prosperity Fund** – following the departure of the UK from the European Union the Government have announced that a new fund will be created to support communities across the Country.
  - **WYCA/ Mayoral Authority** – the West Yorkshire Combined Authority are already working on a number of projects which are being funded through the Growth Deal. More recently with the announcement of Mayoral elections in 2021 and the signing of a new devolution deal, this will mean that new funding will be coming forwards for priorities which partners consider to be important in their Boroughs. Housing and employment sites will be recipients of this funding, subject to an evaluation process.
  - **National Lottery Heritage Fund** – this funding is available for projects which are bringing forward the restoration of heritage buildings. Such funding is generally made available to not for profit organisations/community groups which will take forward projects in order to create sustainable long-term projects within the historic estate. Such funding can also be supported with funding from **Historic England** and the **Architectural Heritage Fund**.
  - **Homes England** – the agency has a number of funds which can support development, normally through loans to enable schemes to proceed. However, it also has the Community Housing Fund which supports local communities to come forwards to develop housing projects.
- 19.3 With the current Covid-19 crises it is likely that capital funding sources may increase in order to enable projects to be unlocked and proceed. Announcements have been made with respect to the Getting Building Fund and additional resources for the delivery of affordable housing which is accessible to Registered Providers and therefore could be another potential opportunity to secure delivery of sites.

## 20 Conclusions and Recommendations

20.1 Table 20.1 summarises the assessment of each site and shows where there has been a decrease or increase in employment ('B' use) floorspace (sqm) and a decrease or increase in residential dwellings. In total, we are estimating that there is 13,883 sqm less of employment capacity than as assessed at the Publication Draft stage and an increase in residential yield by 617 dwellings.

**Table 20.1 - Summary of mixed-use site allocations capacity**

Ref	Publication Draft 2018		AspinallVerdi Assessment 2020		Change from Publication Draft 2018	
	'B' Use Sqm	Dwellings	'B' Use Sqm	Dwellings	'B' Use Sqm	Dwellings
LP0032	0	0	8,000	220	8,000	220
LP0264	3,600	10	1,417	40	-2,183	30
LP0289	2,150	10	472	24	-1,678	14
LP0509	4,908	0	7,900	90	2,992	90
LP0573	0	0	2,741	118	2,741	118
LP0579	2,000	60	2,000	60	0	0
LP0749	0	79	1,699	56	1,699	-23
LP0771	0	30	0	30	0	0
LP0922	2,220	11	2,213	12	-7	1
LP1088	2,820	14	1,428	12	-1,392	-2
LP1123	6,920	38	4,300	68	-2,620	30
LP1170	3,000	42	2,630	131	-370	89
LP1431	3,480	17	3,480	17	0	0
LP1622	29,330	0	10,000	0	-19,330	0
LP1632	4,680	47	2,945	97	-1,735	50
<b>Total</b>	<b>65,108</b>	<b>358</b>	<b>51,225</b>	<b>975</b>	<b>-13,883</b>	<b>617</b>

Source: AspinallVerdi

20.2 We provide an indicative split of the employment floorspace by use class at Appendix 3 – Employment Capacity (Sqm) by Use Class. This indicates the potential capacity for:

- 26,595.50 sqm of B1a accommodation
- 24,629.50 sqm of B1c/B2 accommodation

20.3 We summarise some of the key changes behind the change in capacity from the Publication Draft below:

- LP0032 is a new mixed-use allocation resulting in 8,000 sqm of new employment capacity and 220 residential dwellings
- LP0264, LP0289, LP1170 and LP1632 have all been re-assessed and increases in residential capacity has had a negative impact on the quantity of employment space.
- Planning application on LP0509 for residential has enabled more detailed assessment of the site.
- There was no capacity assessment for LP0573, so this is assumed as an increase
- LP0749 is a reassessment of the conversion of the existing mill buildings. Of the three main mill buildings one is assumed to be workspace and then the residential conversion potential of the Mechanics Workshop is reflected.
- LP1622 being unable to accommodate residential and a reduced amount of employment

20.4 Following our assessment, we would recommend the following changes to allocations:

- Re-allocate LP0771 for residential development
- Re-allocate LP1622 for employment development

## Appendix 1 – Site Layout Plan for LP0032

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## Appendix 2 – Site Assessment Calculations

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### Appendix 3 – Employment Capacity (Sqm) by Use Class

Ref	Total Sqm	B1a	B1c/B2	B8	Comments
LP0032	8,000.00	-	8,000.00	-	
LP0264	1,417.00	1,417.00	-	-	
LP0289	472.00	472.00	-	-	
LP0509	7,900.00	7,900.00	-	-	Potential for B1c/B2
LP0573	2,741.00	2,741.00	-	-	
LP0579	2,000.00	2,000.00	-	-	
LP0749	1,699.00	1,699.00	-	-	
LP0771	-	-	-	-	
LP0922	2,213.00	1,106.50	1,106.50	-	Assumed a 50:50 split
LP1088	1,428.00	-	1,428.00	-	
LP1123	4,300.00	-	4,300.00	-	
LP1170	2,630.00	1,315.00	1,315.00	-	Assumed a 50:50 split
LP1431	3,480.00	-	3,480.00	-	
LP1622	10,000.00	5,000.00	5,000.00	-	Assumed a 50:50 split
LP1632	2,945.00	2,945.00	-	-	
<b>Totals</b>	<b>51,225.00</b>	<b>26,595.50</b>	<b>24,629.50</b>	-	
<b>%</b>	<b>100%</b>	<b>52%</b>	<b>48%</b>	-	

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