

Name of meeting: Cabinet
Date: 29 August 2018

Title of report: SMALL AFFORDABLE HOUSING SITES.

A Key Decision Notice was previously issued for this report as ‘Sites for Housing Development by Registered Providers’

Purpose of report

1. To outline proposals and seek authority to dispose of a portfolio of Council owned Sites to a Registered Provider to provide affordable housing.
2. To seek Cabinet authority to seek expressions of interest in the development of those Sites in the portfolio for affordable housing

Key Decision - Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	Yes
Key Decision - Is it in the <u>Council’s Forward Plan (key decisions and private reports)?</u>	Yes
The Decision - Is it eligible for “call in” by Scrutiny?	Yes
Date signed off by Strategic Director & name	Karl Battersby - 15.08.2018
Is it also signed off by the Acting Service Director for Finance IT and Transactional Services?	Eamonn Croston- 16.08.2018
Is it also signed off by the Service Director for Legal Governance and Commissioning?	Julie Muscroft – 16.08.2018
Cabinet member portfolio:	Cllr Cathy Scott - Adults and Independence Cllr Graham Turner - Corporate

Electoral wards affected: Batley West, Colne Valley, Crosland Moor & Netherton, Liversedge & Gomersal, Mirfield, Newsome.

Ward councillors consulted: All Ward Councillors in the above Wards have been consulted on the plans, and will also be able to comment on this report.

Public or private: Public

1. Summary

- 1.1 Improving housing supply as part of the infrastructure for growth is a Leeds City Region priority, and growth and affordability are integral to delivering Kirklees Economic Strategy and Kirklees Joint Health and Wellbeing Strategy outcomes.
- 1.2 The council wants to accelerate supply by working with partners to bring sites forward, including its own land, and it has announced an ambitious programme to deliver 10,000 new homes over 5 years to 2023. 1,000 of these homes will be on council land.
- 1.3 This report seeks authority bring forward a portfolio of council owned sites in its 'Small Affordable Housing Sites' programme, to release them to Registered Providers following a soft market testing exercise to establish interest in the programme from Registered Providers and their delivery partners. This programme is designed to maximise affordable housing delivery on council sites and it could deliver about 160 new homes. It links to the Council's Housing Strategy and Housing Growth Plan which are also being considered at this Cabinet meeting.
- 1.4 Subject to Cabinet authority to dispose of the portfolio of sites, it is proposed to progress to a short competitive exercise through YORtender, the council's recognised procurement portal, to issue information, receive and evaluate potential partners' expression of interest submissions.
- 1.5 Using this approach, the Council can benefit from the affordable housing development sector's capacity and resources to enable and maximise investment in affordable housing delivery. In order to ensure that schemes are financially viable, it is expected that Registered Providers will access Homes England funding to support the programme. This will support the programme delivery since Homes England grant funding includes site development obligations.
- 1.6 The acquiring organisation of the land will be a Housing Association. The affordable housing sought would be for social or Affordable Rent, or intermediate housing (such as shared ownership). This would address general needs, although providers may also provide specialist housing and bungalows.

2. Information required to make a decision

Housing supply and affordability

- 2.1 Improving housing supply and affordability to meet the need for more market and affordable housing, has positive health and wellbeing impacts, and it promotes economic growth and resilience. These are key elements of the Kirklees Economic Strategy and the Kirklees Joint Health and Wellbeing Strategy, which are being embodied in the emerging housing strategy.
- 2.2 The market alone is not yet delivering the housing numbers required. The council has intervened to support the delivery of affordable and market housing by bringing its land forward for SME developers in its Small Sites Programme, and more recently, through a competitive pilot approach through YORtender to sell land to a Housing Association to develop affordable homes, now under construction. It is also working to tackle stalled sites. The council has outlined its ambitions to deliver 10,000 homes over the next 5 years, including 1000 homes on its own land, so further initiatives are required to support this growth.

Small Affordable Housing Sites Programme: Working with delivery partners

- 2.3 Housing Associations and their development partners use their capacity, resources, expertise and procurement routes to deliver new homes. By commissioning the sector to build on identified council sites, private borrowing and Homes England funding can be accessed by Housing Associations (Registered Providers), with delivery supported by development partners.
- 2.4 The key barrier to the affordable housing sector is access to land. Owners' expectations of land value remains high, and even with Homes England grant support, acquiring land in competition with mainstream market developers often proves difficult. By releasing land through a competitive process, the council is able to assist housing delivery, whilst achieving capital receipts.
- 2.5 The Council's Strategic Tenancy Policy recommends working with partners on private and Council owned land where this can contribute to lowering development costs, increasing the supply of affordable housing, and delivering a range of affordable housing products and tenures.
- 2.6 The Small Affordable Housing Sites Programme objective is to:
- Maximise the delivery of affordable housing
 - Meet housing need
 - Contribute to delivering 1000 homes on council land
 - Support the delivery of Local Plan sites
 - Maximise partners' investment in affordable housing
 - Work collaboratively with external partners to use their capacity, skills and investment to increase the pace of housing delivery
 - Build on recent experience of competitive site disposal and development
 - Broaden the range of partners investing in housing in Kirklees
 - Secure capital receipts for sites at their market value

Land asset review and package of sites for the programme

- 2.7 To prepare for the Local Plan, the Council has reviewed its land assets to identify the best use of each site. 8 sites have been identified to bring forward for Registered Providers and their development partners in this programme. Although aimed at general needs, Registered Providers could also propose specialist housing and bungalows.
- 2.8 Ranging from 0.23 ha to 2,38 ha, with a capacity of 5 to 57 units, the sites would provide around 160 new homes, subject to planning permission. These sites fall between those in the previous Small Sites Programme, and larger sites being brought forward through other approaches.
- 2.9 The sites proposed for this programme are listed in **Appendix 1** (attached). One site is a potential site for specialist housing and it may be removed from the list if analysis confirms its suitability for that purpose.
- 2.10 Smaller sites are usually disposed of under delegated powers pursuant to existing cabinet authority. However, based on market sales analysis prepared for the Council, [used to evidence its Community Infrastructure Levy charges], the total aggregate value of these sites in this programme has potential to be around 5.42.ha and over £4.17m of land. Formal

valuations will be prepared and reviewed to confirm the market value of the sites, although in aggregate, the programme falls outside the scope of the scheme of delegation.

- 2.11 Sites for this programme are being brought to Cabinet for consideration and approval for disposal. Final site disposal would be subject to preferred partner selection, and formal valuation. Final cabinet authority will be required in relation to those sites that constitute open space and where objections are received to their disposal.

Soft Market testing

- 2.12 To assess project risk and to develop a deliverable programme, officers have worked with Homes England to co-ordinate a soft market testing exercise to allow a range of partners to indicate their interest. Undertaken in April, this process has secured interest from 14 organisations comprising Housing Associations and their development partners. These Housing Associations would become potential bidders to become the councils preferred delivery partner.
- 2.13 Whilst some potential bidders prefer the sites to be released in phases, the majority of feedback indicates that the sites would be best released as a package. This would allow cross subsidy between sites which may be less viable if developed as a single development exercise.

Process and Risk

- 2.14 The proposal is to use the YORtender portal to manage a competitive pre-qualification, submission of interest and evaluation process, to arrive at a preferred partner. Using this process allows external partners to indicate their proposals, type, tenure and number of affordable homes and indicate their proposals for the package of sites. It also enables consistent and transparent provision of information to interested parties.
- 2.15 An evaluation of process and legal risk suggests that the most straightforward approach is to proceed on the basis of an informal expressions of interest and clarification exercise to arrive at a preferred and selected partner. The preferred/selected partner will be a Housing Association and will be either be a single partner or a lead partner of a consortium. Where the preferred/selected partner is a lead partner of a consortium, the transfer of each site may be to one or more Housing Associations within the consortium.
- 2.16 The partner will need to be willing to acquire the Sites at market value and to apply for planning permission. Throughout the process, prospective and successful partners will be able access information made available by the council to allow an informed and iterative dialogue about addressing any prescriptive rights or other legal issues affecting sites. This will enable risk evaluation and increase the prospects of planning applications being successful, permissions being acceptable to the buyer and legally capable of implementation. It will also inform development costs and any bids for Homes England funding to support affordable housing.
- 2.17 As with any development site, risk arises from title, prescriptive rights, easements, claims to adverse possession and physical or policy constraints, and development costs arising from each site. Officers are reviewing the sites to ensure and that sites can be offered for sale where possible with vacant possession and with as full property information as possible on the title to the Sites.
- 2.18 Detailed property information will enable potential buyers to make informed bids and to enable them to work up planning applications taking into account issues such as

prescriptive rights, so that planning permissions granted are capable of being lawfully implemented.

Postponing the preparation of the drawing up of the property information until after the bidder has secured planning permission risks information being revealed which could delay development implementation, or the site being left undeveloped.

- 2.19 The sale of the sites will be at market value and the market value of each site will be determined after planning permission has been granted for that Site. Registered Providers will therefore be required to tender/bid subject to the pre-requisites that they will be required to pay the market value for the Sites (whatever that market value for a particular site may be determined to be after planning permission has been granted for the particular Site) and also to apply for planning permission at risk. This may rule out some bidders who are expecting the Council to have managed all risks. However, the provision of site and title information and the council's pre-application development service will offer bidders the opportunity to prepare their own schemes to address site issues, risks and any development constraints using their project design and commissioning processes.
- 2.20 Grant funding from Homes England allows Affordable Rented and shared ownership housing and it will help eligible bidders to access funding to maximise affordable housing delivery. Officers in Homes England have confirmed that whilst authorities are encouraged to support affordable housing development, Homes England is prepared to consider the inclusion in any award of grant funding sufficient funding to enable a Register Provider to pay the market value for the purchase of a land even if the seller is a local authority.

Evaluation

- 2.21 In order to ensure that the programme meets the council's objectives, the only bidders proposals that will qualify for consideration are those proposals where the bidders propose to build only affordable housing, pay market value and apply for planning permission at risk. Further evaluation criteria would include quantitative and qualitative factors, based on bidders' proposals and supporting statements. Evaluation could consider issues such as:
- The number, size and bedrooms of affordable homes proposed
 - Type of affordable tenures to meet identified needs
 - Pace of Delivery: the bidder's project plan and capacity to deliver/accelerate delivery
 - Quality of Place and home
 - Contribution to jobs and apprenticeships
 - Support for local supply chains
 - Use of Innovation – build systems, flexibility and adaptability
 - Agreement to adhere to the council's nominations agreement for rental properties
 - Community engagement during the process.
- 2.22 The council will need to undertake robust evaluation process and project management to move the programme of sites from the initial competitive process, through to the legal site transfer, development mobilisation and monitoring. This is expected to see sites coming forward through the planning system, and to disposal stage once a satisfactory planning permission capable of lawful implementation has been granted. Approaches can include release only once all sites have permission, although it is considered that the most appropriate route is to sell sites once planning has been granted, to encourage early development.
- 2.23 Where Homes England grant funding is present, development monitoring would be supported by, and largely accountable to Homes England in relation to its contractual

arrangements with RPs and their development partners. Consequently this programme will be less resource intensive for the council.

- 2.24 As required by statute it is proposed to advertise the proposed disposal of those of the Sites that constitute open space once Cabinet has agreed the programme and competitive exercise. Further authority to the disposal of any particular site that constitutes an open space will be sought from Cabinet if any objections are received in relation to the disposal of that particular site.

Outline project stages and delivery

- 2.25 Subject to cabinet authority, officers will continue to prepare documentation for the competitive exercise and evaluation process. Continued liaison with Homes England on the programme will help to ensure that potential partners' grant funding enquiries and submissions can be managed by Homes England officers, and for the council to respond to any bid support requests.
- 2.26 It will also be useful in relation to Homes England's support for the programme by awareness raising with potential partners. In the delivery stages of the programme, Homes England will also have an important role to undertake in providing grant payments and in monitoring grant recipients' starts on site. Consequently liaison between the Council and Homes England will support programme monitoring and delivery. Grant recipients will be accountable to Homes England in meeting their start on site obligations and incentivised funding payments to secure practical completion, and in mitigating project exceptions. The council will have an important role in facilitating development advice and determining the planning applications as Local Planning Authority and as land owner, entering into Agreements with the successful partner to transfer the sites.
- 2.27 It is expected that the competitive exercise would be launched September 2018 and where possible the first start on site will encouraged before the end of September 2019. An outline timescale is attached as **Appendix 2** to illustrate the programme primarily from the legal and planning process perspective to achieve the first start on site. This is ambitious, and working closely with Homes England and partners, accelerated delivery will be encouraged. It is expected that most of the programme delivery will have reached an advanced stage by March 2021 and all delivery completed before the end of March 2022. Working closely with Homes England and the successful partner will enable the detailed programme delivery timetable to be updated in respect of each site development sequence of each site in the programme are amended.
- 2.28 Sequencing the transfer of the sites to the buyer will be important to ensure that a start can be made on delivering the new dwellings. One approach is to transfer the sites once planning permission has been granted for all the sites. However, this risks delay on delivery and risks placing the partner in breach of Homes England funding and development obligations.

It is considered that the transfer of each individual site to the successful partner once planning permission has been granted will be the most effective approach to securing a start on site. Risk exists in a partner not achieving planning permission. However, as with any development site the council will work with the partner to evaluate whether the reasons for refusal can be overcome.

3. Implications for the Council

- 3.1 Housing delivery is at the heart of economic investment and growth, changing places and people's lives. It is a cross-cutting theme which will address a variety of issues for the

council and its residents. At this stage, specific schemes have yet to be developed for each site.

- 3.2 Early Intervention and Prevention (EIP):** From an EIP perspective, affordable homes can support this priority as whilst the units are principally for general needs, some providers may deliver homes for more vulnerable residents. In all cases, access to a safe, warm affordable home can help to reduce the risk of requiring intervention.
- 3.3 Economic Resilience (ER):** Affordable Housing is an integral part of building housing infrastructure for growth, and in building Kirklees' Economic Resilience, and securing Kirklees Economic Strategy outcomes. It secures construction employment, local spending and this scheme will help to sustain longer term partner investment. This programme is also an opportunity to add social value to these developments by ensuring that the use of apprenticeships, labour and local supply chains can be promoted. Consequently, this programme underlines the strong contribution of housing in delivering the ER theme.
- 3.4 Improving Outcomes for Children** These affordable homes will help to provide warm, modern accommodation for families who are unable to access a home on the market without intervention. This means that children of households who are otherwise at risk of living in poor quality private sector rented accommodation will have a better start in life.
- 3.5 Reducing demand of services** Building new, quality homes can positively impact on households' wellbeing and life chances and has a consequent impact on the demands for public services. This scheme also reduces costs for the council in bringing forward housing development by externalising risk and investment from partners.
- 3.6 From a financial perspective,** this programme will secure significant partner investment into Kirklees, potentially over £13m. It should also be noted that partners will be encouraged to secure Homes England funding as the major funding partner for affordable housing. At this stage it is not possible to give an exact investment figure, given individual site development costs and circumstances.

4. Consultees and their opinions

- 4.1** Procurement team, planning and Legal Services advice has been sought. Ward Councillors have been consulted to follow up on earlier engagement and allow comments on the sites. As this involves several Wards the comments are set out in Appendix 3.

5. Next steps and approval sought

- 5.1** Following the publication of the statutory Notices to dispose of open space a brief competitive process supported by the council's procurement service and YORtender will be used in this programme. The exercise will issue the sites as a single portfolio to avoid 'cherry-picking', and some sites remaining undeveloped. It may be necessary to review and re-issue this as more than one package if submissions are weak or where a later submitted planning application is refused. During the project, the Council will expect that partners provide support in engaging nearby communities and Members as is already best practice in planning submissions.
- 5.4** The process will invite the submission of pre-qualification information, including partners' capacity to undertake the scheme, and clarify their indicative proposals for the sites. This will include time for site evaluation, consideration of title and property information and factors such as the types of tenure of affordable housing, the number of affordable housing units and the size and number of bedrooms of those affordable housing units. It will also

allow the submission of additional details such as social value e.g. construction apprenticeships.

- 5.5 A further stage will be the formal evaluation of prospective partners' offers for sites, balancing their development proposals, funding and capacity to deliver, and further offers (e.g. skills, apprenticeships and training).
- 5.6 It is proposed that the development of the sites will be subject to compliance with the council's nominations agreement where this includes rented accommodation. This would be 100% nominations in favour of the council on first lets, and 50%/50% council/provider thereafter.
- 5.7 Prospective partners will be invited to demonstrate how a start on site will be achieved quickly following grant of planning permission and completion of sale. In practice where Homes England grant is being contributed, the bidders will be accountable to Homes England in performing to their grant and delivery obligations. The successful partner(s) will be responsible for their own costs and risks, and obtaining the necessary planning and building regulations consents once authority to dispose has been obtained.

6. Officer recommendations and reasons

It is recommended that:

- 6.1 Cabinet approves the disposal of the portfolio of sites in Appendix 1 to a Registered Provider through competitive exercise as described in this report.

Reason: The competitive exercise will ensure the delivery of much needed affordable housing
 - 6.2 Cabinet endorses the issue of the statutory notice to advertise the disposal of those sites that constitute open space

Reason: To comply with legislative requirements.
 - 6.3 Cabinet agrees to delegate authority to the Service Director for Legal, Governance and Commissioning Support and the Strategic Director for Economy and Infrastructure to negotiate and agree terms and complete the sale of sites once planning permissions have been obtained, unless further authority is required in respect of the disposal of any site where objections are received following the publication of the statutory notices advertising the disposal of the particular site.
 - 6.4 Cabinet agrees to delegate authority to the Service Director for Legal, Governance and Commissioning Support to enter into and execute any agreement and any other ancillary documents necessary to enable the sale and transfer of the sites in the Small Affordable Housing Sites portfolio as described in Appendix 1 to the report.
- ## **7. Cabinet portfolio holder recommendation**
- 7.1 **Cllr Cathy Scott- Adults and Independence Portfolio Holder:** (Comment agreed at 6/8/2018 briefing)
Cllr Scott supports the proposals although wishes different types of tenure to be explored, and for supported living to be considered. Officers should explore different types of grant funding that is available.
 - 7.2 **Cllr Graham Turner – Corporate Portfolio holder:** (Comment agreed at 6/8/2018 briefing)

“This scheme will balance the need to secure capital receipts for land with affordable housing delivery outcomes. This shows that the Council can and will take a lead in bringing its assets forward to challenge and enable partners to help us to tackle the growing shortage of affordable housing, and secure partners longer term housing investment in Kirklees. I recognise that timescales are ambitious, although working with Homes England will help towards meeting these. I fully support this project”

8. Contact officer:

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9. Background Papers and History of Decisions N/A

10. Service Director responsible:

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Appendix 1: List of sites proposed for release. This includes Local Plan information.

No	Site	Ward	Gross area (ha)	Potential FVA values £	Potential plot values	Site capacity assessed in the Local Plan or at 35 units/ha	Local Plan ref	Local Plan conclusion & notes
1	Blue Bell PH, and Land to south east of Blue Bell Hill, Newsome	Newsome	2.38	1764294)	30952	57 units	H1811 indicative 57 dwellings	The site is an accepted housing option. Access can be achieved via Mansion Gardens. West Yorkshire Ecology recommend removal of 1.42ha from developable area leaving 0.95ha. This has not been done at allocation stage. The site is considered to be of limited biodiversity value; such issues can be addressed in the scheme layout at planning application stage. A Heritage Impact Assessment is required.
2	Kitson Hill Crescent, Mirfield	Mirfield	0.26	192,738	35000	7	-	-
3	Former Stile Common school site *	Newsome	0.94	696,822	29000	24	H2685 (indicative 32 dwellings)	No physical constraints to developing the site that cannot be mitigated against at the

								planning application stage.
4	Adjacent to Mowat Court, Sixth Avenue	Liversedge and Gomersal	0.34	252,042	21000	12	-	-
5	Woods Avenue, Marsden	Colne Valley	0.23	170,499	21000	8	-	-
6	Nabcroft Lane, Crosland Moor +	Crosland Moor and Netherton	0.49	363,237	16000	23 (as per planning permission)	-	Site has outline planning permission (2017/91273) for 23 dwellings)
7	Common Road, Batley	Batley West	0.66	489,258	21000	23	H760 (23 dwellings)	Site access is achievable to this site option. There are no significant constraints with the site which cannot be mitigated against at the planning application stage.
8	Off Fox Royd Lane	Mirfield	0.12	88956	17791	5	-	-
	Indicative TOTALS		5.42	£4,017,846		159	167	

Notes:

Site 1 combines 2 sites at Blue Bell public house and land to south east of Blue Bell Hill as the sites are dependent on a joint access. This site is combined from 2 sites with a total of 2.38 ha.

Site 5 is also being assessed for its suitability for use as specialist accommodation. If analysis confirms its suitability for that purpose, it will be removed from the list.

Site 8 has an extant outline planning permission for 23 dwellings.

Smithy Parade, Dewsbury, has been removed from the programme, pending further investigation. It is an accepted housing option in the Local Plan.

Appendix 2:

Outline development timescales to first start on site [Subject to revision and Homes England input on funding and development obligations]

DATE	: ACTION / EVENT
June to September	: -Preparation of site information, agree site boundaries - Prepare and agree competitive exercise brief - Prepare and agree evaluation criteria/matrix scoring - Brief internal colleagues on the programme and their inputs -Liaison with Homes England on programming; regular liaison throughout the programme.
29 August 2018	: Cabinet
Late September 2018	: Competitive exercise: Expressions of Interest invited (6 week duration)
Early November 2018	: Deadline for receipt of Expressions
Early November 2018 – early December 2018	: Evaluation and clarification of all the expressions of interest
Early- Mid December 2018	: Announcement of Preferred Partner
Mid February 2019 – May2019	: Preparation and submission of planning applications by the preferred partner for each of the sites in the package Applications to Homes England by the preferred partner for the sites in the package to be developed out as affordable housing Council/Homes England liaison on bid submissions
During the period from March 2019 onwards	: The issue by Council’s external solicitors to the lawyers acting for the Preferred Partner of: (i) Agreements for sale re all the sites in the package (ii) Title documents re all the sites; (iii) Property Information re all the sites; The negotiation and agreement of the Agreement for sale pending the grant of planning permission and the determination of the sale prices. This will support both parties’ readiness to enter into a legally binding sale agreement as soon as the sale price for a particular site

		is determined following the grant of planning permission for that particular site
June 2019 – September 2019	:	Determination of planning applications – either grant of planning permission (or “minded to grant” resolutions where planning obligations are required to be entered into simultaneously with the grant of planning permission), or refusal
During the two month period after grant of planning permission/minded to grant resolution for a particular site (September to end November)	:	<p>The negotiation and agreement of the market value/best consideration value for the site where the planning permission has been granted or there has been a minded to grant resolution</p> <p>The negotiation and agreement of any Section 111 Agreement (providing for the grant of a Section 106 Agreement on transfer of the Site) if the Planning Authority require planning obligations to be agreed before the grant of planning permission.</p> <p>The finalisation of the application to Homes England for grant funding, and bid support submission</p> <p>The entering into a legally binding Agreement for the sale of the Site</p>
During the period after the grant of planning permission until the start on the particular Site	:	The discharge by the Preferred Partner of any pre-development planning conditions that must be satisfied before development commences
Early August 2019 - November 2019	:	Exchange of legally binding individual agreements for the Sites
Early September 2019 – December 2019	:	Completion of Transfer of Sites
September 2019	:	First Start on Site and payment of Homes England grant funding
September 2019 to March 2022		Delivery of site development
March 2022		Final delivery of sites and project review

Appendix 3 : Ward Members' consultation comments on sites within their Wards

These comments comprise consultation response received on these sites in May 2018.

Any further comments received will be reported.

Batley West:

Colne Valley

Cllr Rob Walker

In principle I am very much in favour of providing more affordable housing on infill sites such as this. It is important that this type of housing provision is made available across all wards. I am pleased that we as an authority are taking a proactive approach to meeting this housing need.

I would of course need to know more about any local concerns. As both of my ward colleagues live very close to this site they are probably in a better position to gauge the local feeling about this proposed development. I am interested to know their impressions.

Crosland Moor and Netherton

Liversedge and Gomersal

Cllr David Hall:

I have previously not agreed with the release of this land for building, as local residents regard it as a valuable amenity space on the Windybank Estate.

That remains my preference. If the decision were made to release the land, however, I would strongly recommend that it goes to a registered provider for older people's accommodation which ties in with the existing neighbouring Mowat Court and Thirteenth Avenue. New residents would then hopefully fit in well with the existing residents, facilities and social activities. I know that this is the feeling of the residents there, as I have discussed the issue with them on several occasions.

Mirfield

Newsome

Newsome ward members have met with senior officers to outline their views. They are still opposed the development of the Taylor Hill site (note: revised description as land to the south east of Blue Bell Hill, Newsome, reflecting Local Plan description) on the basis that it had useful green corridor and ecological importance. They were supportive of development on Stile Common but would want it to be developed for older people/extra care.