

**Proposed Employment Site –
Representation to Kirklees Local
Plan**

Land at Cooper Bridge, Huddersfield

February 2016

Turley

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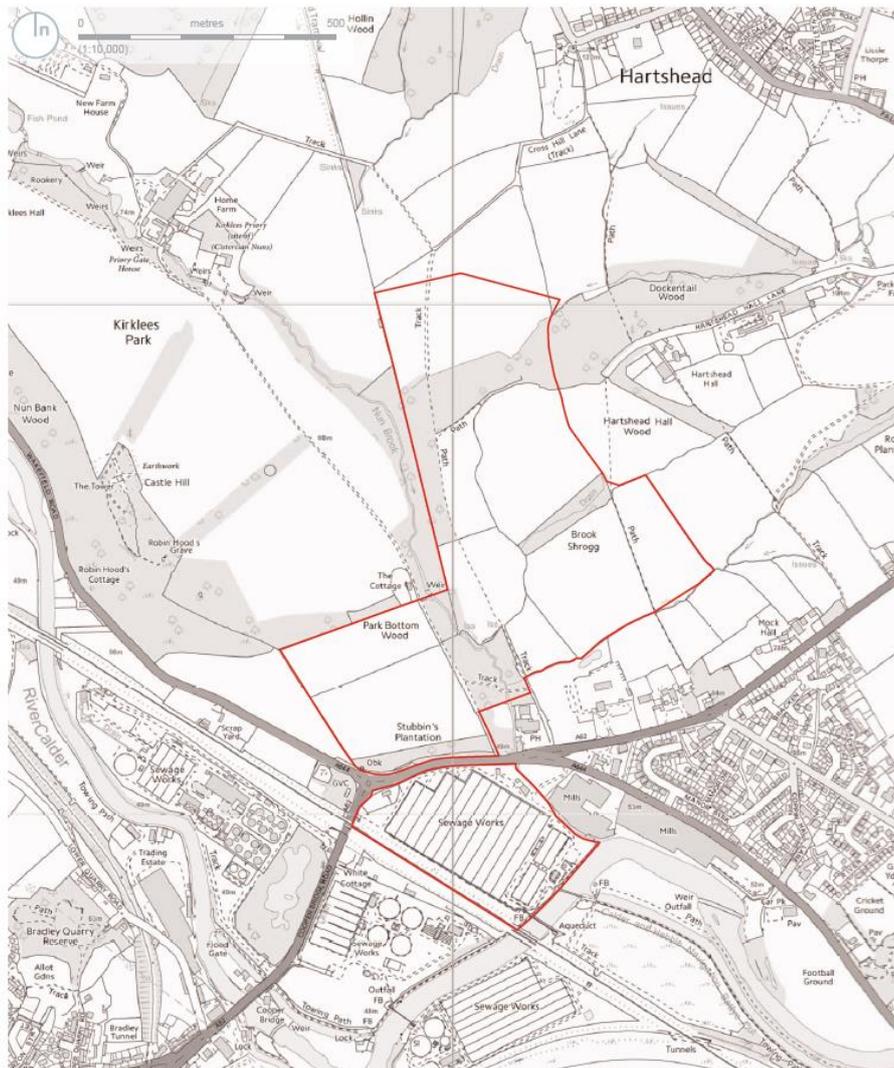
1 February 2016

1. Introduction

- 1.1 This representation is prepared by Turley on behalf of Keyland Developments Ltd and the Kirklees Estate in relation to the promotion of land at Cooper Bridge, Huddersfield (“the site”) as a strategic employment site. The development will provide a range of accommodation, primarily for advanced manufacturing, precision engineering and distribution uses.
- 1.2 Part of the site is an established Waste Water Treatment Works which is at the end of its operational life. As previously developed land, the redevelopment of this land is supported both by local and national planning policy. The larger part of the site is situated within the Green Belt.
- 1.3 This report constitutes a formal representation to the Council’s Local Plan consultation process.
- 1.4 Its purpose is to support the proposed allocation of the site for employment development. It sets out the land owners views on the ‘exceptional circumstances’ which apply in this case to justify release of the site from the Green Belt. This supports the Council’s decision to include this site as a future employment allocation.
- 1.5 The consultation documents against which this representation is made (with respect to the relevant sections in this report) are:
 - Strategy and Policies
 - Allocations and Designations
 - Green Belt Review and Outcomes
 - Sustainability Appraisal
 - CIL Preliminary Draft Charging Schedule
- 1.6 The covering letter that accompanies this representation sets out the elements of this report that are applicable to each of the consultation documents.
- 1.7 This report follows the preparation of a Feasibility Report in July 2015, which demonstrated that there is a clear and pressing need for the release of several prime strategic employment sites in Kirklees.
- 1.8 Cooper Bridge, by reason of its location, deliverability and the nature of the employment uses it could accommodate, is well positioned to deliver the City Region’s and Council’s economic aims and objectives, as set out in their respective Economic Strategies.

2. Site Location

- 2.1 Cooper Bridge lies to the north-west of Mirfield, north-east of Huddersfield and south-west of Liversedge.
- 2.2 The site is situated to both the north and south of the A644 and A62, at the junction with Cooper Bridge Road. The M62 (Junction 25) is located approximately 1 mile to the north west of the site. There are train stations nearby at Deighton, Brighouse, Mirfield and Ravensfield, all within 2 to 5 miles of the site.
- 2.3 These stations, along with the various bus routes near to the site, provide excellent access to surrounding towns and key commercial centres including Dewsbury, Huddersfield and Leeds City Centre. They also provide excellent access to a local work force and nearby businesses in the north Kirklees / South Bradford / East Calderdale manufacturing arc.
- 2.4 The location of the site is shown below, outlined red, on the OS-based site location plan and the aerial photograph.





Existing Use and Ownership

- 2.5 The site comprises two separate, but interlinked, parcels of land (as shown above). The larger area of land to the north of the junction is approximately 39ha and is in the ownership of the Kirklees Estates. The smaller area of land to the south is approximately 7ha, owned by Yorkshire Water, and under the control of KeyLand Developments Ltd.
- 2.6 The land to the north of the existing junction is currently used for farming. Its boundaries are defined by the A62 in the south, The Three Nuns public house and commercial development in the south-east and existing footpaths and field boundaries in the north, east and west. The north eastern boundary, in parts, follows land form and the south western boundary is defined by the Calderdale Local Authority boundary.
- 2.7 The land to the south of the existing junction is currently the Cooper Bridge Waste Water Treatment Works (WWTW). This is an operational site which is scheduled to close in the near future. It is currently “white land” in the adopted UDP and is previously developed. Its boundaries are defined by the service and access roads that run around the site, the River Calder to the east and a railway line to the south. It also includes two semi-detached houses with associated residential curtilage in its western part. The western and south-western boundaries are also the Calderdale Local Authority boundary.

Opportunities & Constraints

- 2.8 The following table highlights the opportunities and constraints presented by the future development of the site:

Opportunities	Constraints
<p>The part of the site to the south of the junction is a working waste water treatment facility. As such, it is an intensively developed site, covered in above-ground settling tanks. It is therefore previously developed. Development of previously developed sites for economic purposes is supported by both local and national planning policy.</p>	<p>The land to the north of the junction is Green Belt land, primarily comprising open agricultural fields and tree belts.</p>
<p>The southern site is flat and following removal of existing infrastructure will present relatively few physical barriers to development.</p>	<p>The northern site will necessitate the creation of development plateaux to accommodate employment generating uses. Land further north within the site becomes increasingly difficult to develop due to topography, the need for cut and fill and the need to extend utilities from their main connection points (i.e. the A644 and the A62). This naturally limits the possible northern extent of a development on this site.</p>
<p>The northern site is clear of development, reducing the up-front costs of development.</p>	<p>The southern site will incur costs in removing the existing site infrastructure.</p>
<p>The site has excellent access to the M62 corridor, a key east to west transport route across the UK (part of the trans-European network route), linking the Mersey and Humber ports to Europe.</p> <p>The M62 is a focus for regional scale logistics and warehousing development at key development nodes in West Yorkshire and across to Manchester and Merseyside. It is also the focal point for a cluster of more localised advanced manufacturing uses, centres around north Kirklees, south Bradford and east Calderdale.</p>	<p>Highways capacity in the area is a known constraint. Public funding will be required to address existing capacity issues. A scheme is being developed with the Council and West Yorkshire Combined Authority to define an appropriate scheme and to secure funding. The improvement of Cooper Bridge Roundabout is already recognised as a priority scheme for both the District and City Region.</p>
<p>The site is situated in a key market area, close to existing advanced manufacturing businesses and in an ideal location for supply chain businesses. This will help to enable the establishment of key connections and supply chains within a projected growth area of the local</p>	

economy.

The site is situated adjacent to the Cooper Bridge Junction, which will secure funding for significant improvements to alleviate existing transport problems and open up the economic potential of Huddersfield and the surrounding area.

- 2.9 These opportunities and constraints inform the case to justify allocation of the site for employment purposes, as set out below.

3. The Proposed Use

- 3.1 It is proposed to use the site for employment purposes, including advanced manufacturing, precision engineering facilities, and higher quality distribution units. There may also be elements of research and development associated with the local cluster of manufacturing expertise.
- 3.2 There will be an emphasis on providing high-quality, environmentally-efficient buildings to support the evolving requirements of manufacturing, engineering and distribution. The design, layout and landscaping of the site will reflect the site's position as the prime strategic employment site in Kirklees.
- 3.3 An indicative masterplan is provided below, showing accommodation of around 160,000 sqm (1.7m sq ft) of employment space.



- 3.4 The site is at the heart of West Yorkshire's advanced manufacturing centre, being proximate to both a workforce and consumer population. It is well-connected to the M62 trans-Pennine motorway corridor and is close to the M1. This part of Northern England has become a hub for precision engineering and advanced manufacturing businesses, many of which are looking to relocate or expand existing businesses.
- 3.5 The site has all of the locational characteristics necessary to meet the needs of these businesses which, to date have been frustrated by a lack of suitable land supply.

4. Existing and Proposed Allocations

Existing Allocations (Kirklees Unitary Development Plan 1999)

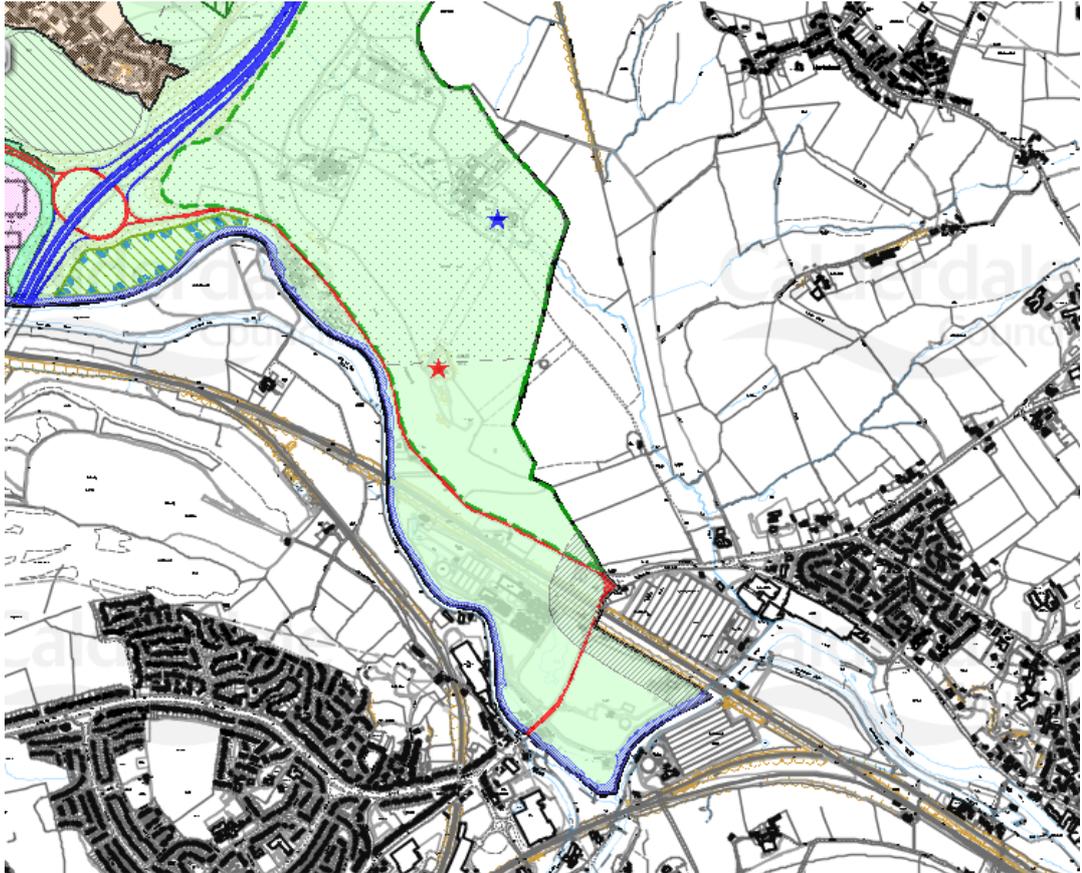
- 4.1 An extract from the adopted Kirklees UDP proposals map, showing the site's location outlined red, is shown below.



- 4.2 As shown on the proposals map, the land to the north of the existing Cooper Bridge junction forms part of the West Yorkshire Green Belt (shaded green). It does not benefit from any specific land use allocations. In order to allocate this land for development, it must be removed from the Green Belt through the Local Plan process.
- 4.3 The land to the south of the junction is unallocated and the general policies of the UDP still apply. These policies, along with those set out in the National Planning Policy Framework (NPPF), are supportive of the redevelopment of previously-developed land.

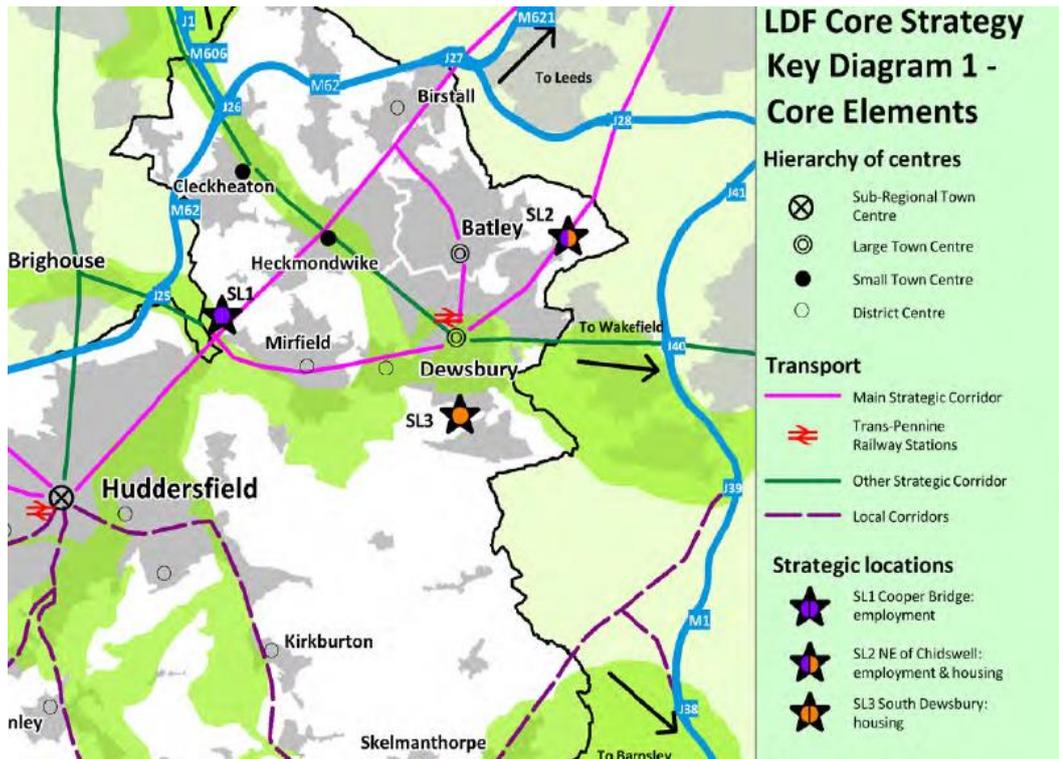
Replacement Calderdale Unitary Development Plan 2006 (as amended August 2009)

- 4.4 Whilst the site is wholly located in Kirklees, it directly abuts the Calderdale border. It is therefore relevant to consider the effects of the proposed employment development on the retained Calderdale Green belt.
- 4.5 The Replacement Calderdale Unitary Development Plan Proposals Map 2006 (as amended August 2009) identifies the adjacent land as Green Belt. The site is also adjacent to the East Bierley/Hopton Top and Hartshead Moor/Dewsbury Pipeline buffer zone. Cooper Bridge Road (the A62) to the south of the site, and Wakefield Road (the A644) to the west of the site, are identified as 'Category 2 Roads' in Calderdale's road hierarchy.
- 4.6 An extract of the adopted Calderdale Proposals Map is reproduced below.



Kirklees Local Development Framework Core Strategy 2012

- 4.7 The Kirklees Local Development Framework (LDF) Core Strategy was withdrawn in 2013. However, the Core Strategy Proposed Submission Document (2012) included the site for employment uses as one of three 'Strategic Locations'.



- 4.8 The site was referred to as Site SL1, as shown on the plan above.
- 4.9 Whilst the LDF was abandoned, this was for reasons unrelated to employment land supply. Rather than undermining the case for the release of employment land from the Green Belt, this delay has simply hampered economic growth by continuing a trend of the non-release of land which is suitable for modern employment purposes.
- 4.10 Continued support for the allocation of a large scale strategic employment site in this part of Huddersfield is evident in both the City Region Strategic Economic Plan and the Kirklees Economic Strategy.

Proposed Allocations

Kirklees Draft Local Plan: Strategies and Policies (November 2015)

- 4.11 The Draft Strategies and Policies document sets out the vision for the plan and sets a number of high level policies designed to guide the overall development strategy and future development management decisions. We generally support the approach taken in this document and set out our views below.

Vision for Kirklees

- 4.12 The following paragraph is supported as it specifically references the role that Cooper Bridge is expected to play in the economic growth of the District, as set out in the City Region Strategic Employment Plan (SEP) and the Kirklees Economic Strategy (KES):

Kirklees will be ideally placed to encourage inward investment and stimulate economic growth. This will be achieved through the provision of new prime employment land, sites of strategic importance for employment with a focus on manufacturing and engineering including Cooper Bridge and Chidswell and safeguarded employment land which, as a

whole, provide the opportunities to grow businesses, improve economic resilience and increase the district's ability to compete with other areas.

Spatial Development Strategy

- 4.13 The spatial development strategy is supported. It references the need to meet employment needs, including the aspirations of the Leeds City Region Strategic Economic Plan and Kirklees Economic Strategy. It also recognises that there is a need for new prime strategic employment locations.
- 4.14 The written justification is also supported, particularly as it recognises that securing sites with key locational characteristics is the primary factor necessary to ensure successful economic development. This can only be achieved, in the current context, by releasing land from the Green Belt, as the land in close proximity to the key transport infrastructure in the District tends to be both greenfield and Green Belt.

Economy

- 4.15 The approach adopted to the allocation of new employment land is supported. It is considered that the Primary Employment Areas (PEA) sites will not deliver a reliable supply of land. We have analysed several of the better located PEA sites in section 6 of this report. This reviews the land which is genuinely available in those locations and considers whether they are capable of meeting the need for new well located land for the target economic growth sectors. Whilst the existence of the PEA supply needs to be reflected in the figures, we consider it to be entirely appropriate to allocate additional land which is capable of meeting the growth aspirations of the SEP and KES.

Strategic Transport Infrastructure

- 4.16 Policy DLP19 is supported. The provision of improvement works to Cooper Bridge and the realisation of a Junction 24a on the M62 will have very positive effects on re-distributing existing congested traffic around the area local to this site. This will create an opportunity to deal with existing traffic issues as well as opening up new land for development, including this site. Avoiding proposals that prejudice these schemes is necessary given the significant benefits to be derived from these improvements.

Kirklees Draft Local Plan: Allocations and Designations (November 2015)

- 4.17 The Allocations and Designations document identifies the site as '*E1832: Site of the former Cooper Bridge Waste Water Treatment Works and land to the west and north of the Three Nuns Pub, Leeds Road, Mirfield.*'. This is a proposed employment allocation.
- 4.18 This proposed allocation is wholly supported by the land owners and prospective developers of the site.
- 4.19 The draft allocation notes its gross area as 46.83 hectares. The net developable area is 40.00 hectares, as part of the site has been removed due to UK Biodiversity Action Plan (BAP) habitat and a 'high pressure gas zone.' It identifies an indicative capacity for employment purposes of 161,185 sq m of floorspace.

4.20 The document's draft site allocations policies also set out the constraints of the sites, along with a general report/commentary about the type of supporting information required and the suitability of the site for development. The constraints for Cooper Bridge are set out as follows:

- Highway improvement required
- Public rights of way cross the site
- Flood zone 2 (24%) and 3a (18%)
- Sequential approach to the location of employment development required within this site to avoid high flood risk areas where possible
- High pressure gas zone
- Part of the site is affected by a UK BAP Habitat
- Impact on Grade II Registered Historic Park and Garden and Kirklees Hall – including other designated heritage assets
- 2 mine entrances identified

4.21 These constraints are discussed in greater detail in the section 6 of this report.

4.22 The draft allocation also identifies the following points to consider :

- The location is identified within the Leeds City Region Economic Strategy
- The location is identified within the Kirklees Economic Strategy
- The proposal is within the Resource Smart Corridor
- Phase 1 and 2 contamination reports are required
- Air Quality Impact Assessment is required
- Noise and odour assessments are required
- Minimum of 10m stand off and planting required on River Calder to protect otters
- Landscape character assessment has been undertaken for this site which should be considered in the development masterplan
- Flood Risk Assessment is required

4.23 Each of these factors are discussed in the subsequent sections of this report.

Kirklees Draft Local Plan: Green Belt Review and Outcomes Report (November 2015)

- 4.24 This Draft Local Plan document sets out the findings of the Green Belt boundary review undertaken to inform the plan. It includes a review of the Green Belt edges and the potential re-drawing of the boundaries to add, or remove, land from the Green Belt.
- 4.25 The document sets out various criteria against which the Green Belt edge is assessed ('the Green Belt Edge Review'). These include various constraints and a series of tests which mirror the NPPF "purposes" of including land in the Green Belt. The site is referred to as CB1 in that assessment. Section 6 of this report sets out the land owners and developers views on those tests and provides further support for the findings of that review.

Kirklees Draft Local Plan: Rejected Site Options Report (November 2015)

- 4.26 This report identifies the site options that were put forward for inclusion in the draft Local Plan and have been rejected.
- 4.27 The methodology used by the Council in deciding whether to reject each option is of interest, particularly with regard to the 'Green Belt Constraint' methodology (shown below).

Green Belt Constraint

Green	The site would present a reasonable extension relative to the settlement it abuts, would have little or no impact on the purposes of including land in the green belt and presents the opportunity to create a strong new defensible green belt boundary
Amber	The site is located adjacent to a part of the green belt edge where assessment has shown that development would have some detrimental impact on the purposes of including land in the green belt and/or the site does not present a strong new defensible green belt boundary but opportunity exists that could mitigate this impact, such as the minor alteration to the option boundary or the removal of some additional land from the green belt
Red	The site would not present a reasonable extension relative to the settlement it abuts and/or the site is located adjacent to a part of the green belt edge where assessment has shown that development would have a significant detrimental impact on the purposes of including land in the green belt, and/or it is located adjacent to a part of the green belt edge that is deemed to be significantly constrained and/or the option is remote from any settlement

- 4.28 The sites that have been rejected due to Green Belt constraints are therefore considered by the Council not to present a reasonable extension relative to the settlement it abuts; and/or where the development would have a significant detrimental impact on the purposes of including land in the Green Belt; and/or it is located adjacent to a part of the Green Belt edge that is deemed to be significantly constrained; and/or the option is remote from any settlement.
- 4.29 The site has not been rejected and therefore representations on this document are not necessary. However, it is noted that our support for the allocation is expressed in respect of other documents and we agree that the site does fall within the "Green"

category above. This is further expanded upon in our comments against the Green Belt Review Outcomes document.

Community Infrastructure Levy: Preliminary Draft Charging Schedule (November 2015)

- 4.30 This document identifies zones for proposed charging rates for residential uses, which is not relevant to the development proposed at Cooper Bridge, as all employment uses are set at a nil charge.
- 4.31 It is considered that the proposed nil rate of CIL is appropriate, given the lower levels of revenue generated by employment uses and the other costs associated with developing this site. If CIL is applied, this could risk the site's viability, which in turn could affect its deliverability and therefore the growth of the employment sector in this location.
- 4.32 The £0 rate of CIL for employment uses is therefore supported.

5. Sustainability Assessment

- 5.1 The Sustainability Appraisal of the plan assesses the emerging Local Plan's likely effects on social, economic and environmental interests.
- 5.2 The Sustainability Appraisal objectives, as set out in the Appraisal Report, are as follows:

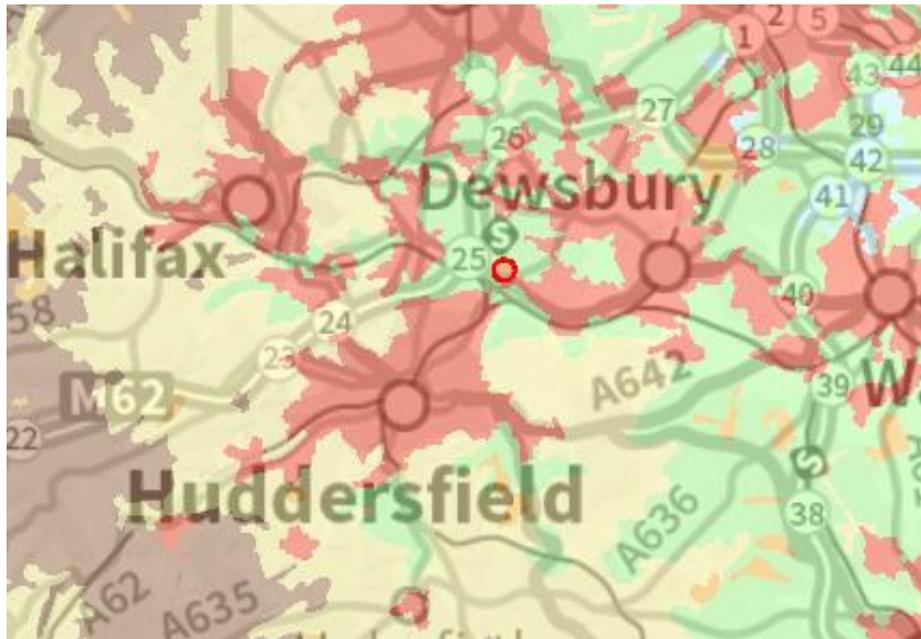
SA Objectives	SEA Directive Topic(s)
1: Increase the number and range of employment opportunities available for local people, and ensure that they are accessible.	Population
2. Achieve an economy better capable of growth through increasing investment, innovation and Entrepreneurship.	Population
3. Ensure education facilities are available to all.	Population
4. Improve the health of local people and ensure that they can access the health and social care they need.	Population Human health
5. Protect local amenity including avoiding noise and light pollution.	Population Human health
6. Retain and enhance access to local services and facilities.	Population
7. Make our communities safer by reducing crime, anti-social behaviour and the fear of crime.	Population
8. Protect and enhance existing and support the provision of new recreation facilities and areas of open space and encourage their usage.	Population
9. Ensure all people are able to live in a decent home which meets their needs.	Population
10. Secure an effective and safe transport network which encourages people to make use of sustainable and active modes of transport.	Air
11. Secure the efficient and prudent use of land.	Soil
12. Protect and enhance the character of Kirklees and the quality of the landscape and townscape.	Landscape
13. Conserve and enhance the historic environment, heritage assets and their settings.	Cultural heritage including architectural and archaeological heritage Material assets
14. Maximise opportunities to protect and enhance biodiversity and geodiversity.	Biodiversity Flora Fauna
15. Reduce air, water and soil pollution.	Soil Water Air
16. Prevent inappropriate new development in flood risk areas and ensure development does not contribute to increased flood risk for existing property and people.	Material assets
17. Increase prevention, re-use, recovery and recycling of waste close to source.	Material assets
18. Increase efficiency in water, energy and raw material use.	Water Material assets
19. Reduce the contribution that the District makes to climate change.	Climatic factors

- 5.3 The Cooper Bridge site – alongside the other proposed/draft allocations and policies – has been subject to scoring against the criteria set out in the Sustainability Appraisal

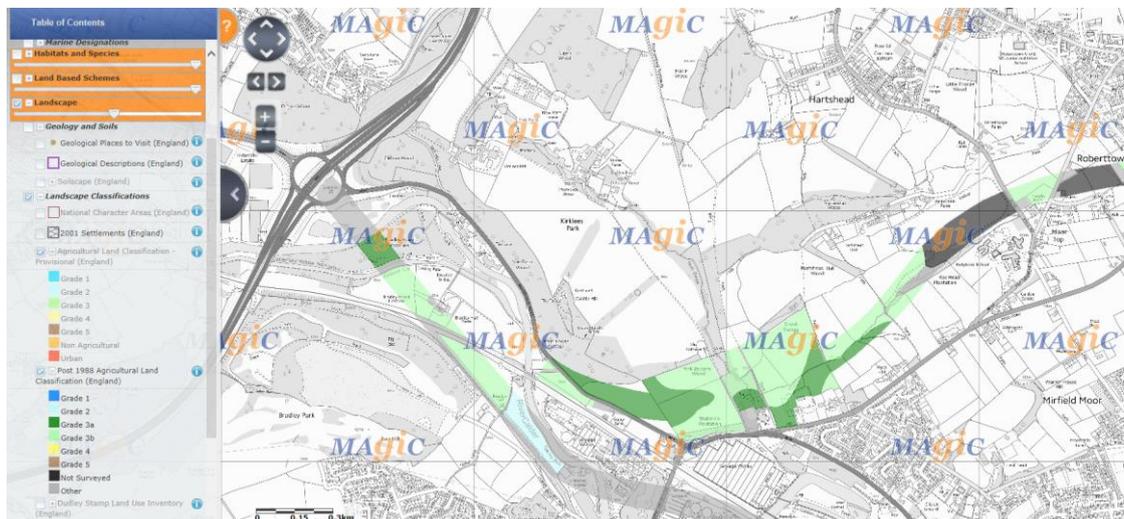
above. The summary of the SA findings for site 'E1834: Cooper Bridge, Leeds Road (A62), Mirfield, Huddersfield' within the 'Employment SA Matrices' are:

Summary of SA findings: *Potential significant positive effects were identified for this site in relation to SA objectives 1: employment and 2: economic growth, and potential significant negative effects were identified in relation to SA objectives 8: leisure and recreation (part of an overall mixed effect), 11: land use (part of an overall mixed effect) and 12: landscape. These issues will need to be considered further in terms of mitigation and/or enhancement, which may be achieved through Local Plan policies.*

- 5.4 We support the Council's acknowledgement that significant positive effects have been identified for employment and economic growth. The proposed allocation will deliver a prime strategic employment site.
- 5.5 In relation to objective 8 (leisure and recreation), the SA scoring matrix does not, in fact, simply identify a significant negative effect. The wording of the appraisal is that '*a mixed effect is likely - minor positive and significant negative,*' which is dependent upon the open space and green infrastructure which can be retained/provided as part of the development.
- 5.6 The majority of the site is privately owned and not open to public access. The site is currently crossed by a number of footpaths. The significance of the effect will be reduced by retaining and / or diverting the rights of way to ensure that the development can proceed whilst not reducing the ability of the site to contribute to public access across the site.
- 5.7 In respect of objective 11, the SA scoring matrix identifies a significant negative effect due to the proposed development being '*a less efficient use of land than development on brownfield sites or sites of lower quality agricultural land.*'
- 5.8 The southern part of the site is previously developed. Agricultural Land Classification data, available on magic.gov.uk, shows that the northern area of the site is Grade 3 land (shown green, with red being urban land):



- 5.9 Whilst this older and more strategic mapping is not clear whether this site is Grade 3a or 3b land, it is clearly not Grade 1 or 2 land. More recent mapping, also available on magic.gov.uk shows that the area adjacent to the main road is largely Grade 3b, with elements of Grade 3a:

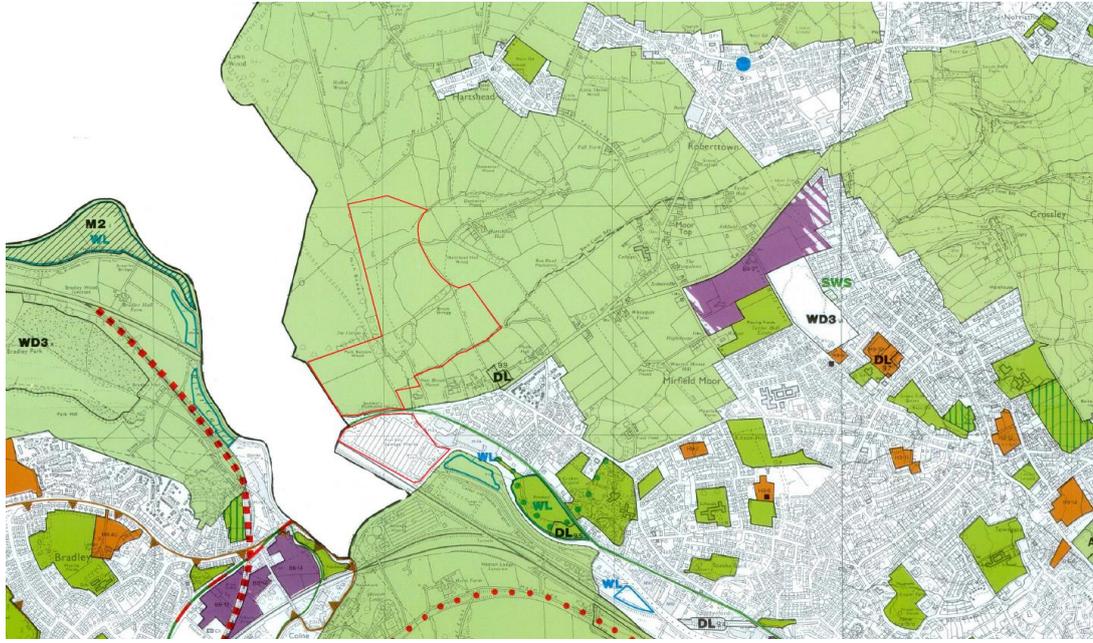


- 5.10 The site is not therefore all Best and Most Versatile land, although it is likely that there are areas of Grade 3a land in the northern section of the site. The site is therefore a combination of previously development, lower quality agricultural land and higher quality agricultural land.
- 5.11 Whilst it is agreed that the loss of best quality agricultural land is a negative effect, we do not consider this to be significant, given the mix of land types and qualities in the site boundary.

- 5.12 Finally, the SA scoring matrix identifies a likely significant negative effect in respect of objective 12 (landscape). It states that the site is relatively large and is on greenfield land, and therefore a significant negative effect on this objective is likely. However, it goes on to say that *“this is uncertain depending on the design of the development.”*
- 5.13 It is inevitable that there will be a loss of countryside as a result of developing this site. However, the extent to which this harms landscape character and visual amenity needs to be established through a more detailed exercise. The master plan put forward to date is illustrative and designed to show the extent of built development which could be accommodated on the site. Any future development proposals will need to be subject to a detailed master planning exercise which reflects the need for connectivity with existing landscape features and to protect existing visual amenity. It is likely that this exercise will involve significant tree planting around the northern and eastern boundaries in order to create a defensible boundary for the new Green Belt.

6. Green Belt

- 6.1 The area of the site to the north of the Cooper Bridge junction is located within the Green Belt, whilst the southern area is within the existing built up area. An extract from the adopted Kirklees UDP, showing the site boundary, is reproduced below.



- 6.2 The Allocations and Designations Local Plan document proposes to release this site from the Green Belt. This is supported. This section of the report sets out the land owner and prospective developers' views on the exceptional circumstances which exist which justify this release. These are set out below.

Exceptional Circumstances

Need

- 6.3 Once a Green Belt has been established, it requires more than general planning concepts to justify an alteration. Essentially, there must be compelling reasons that amount to a “necessity” for the Green Belt boundary to be modified¹. These reasons, or circumstances, have been held in case law to include factors such as ‘need’ and the planning benefits associated with delivering against that need.
- 6.4 In this case, the exceptional circumstances are considered to include:
- the need for a prime strategic employment site,
 - the need for more employment land generally, and
 - the ability of the site to deliver against that need, with reference to its location, deliverability and overall compatibility with Leeds City Region Strategic Economic Plan and the Kirklees’ Economic Strategy 2014.

¹ Gallagher Homes Ltd v Solihull Metropolitan Borough Council

6.5 These circumstances are expanded below.

Economic Strategy

Leeds City Region Strategic Economic Plan (SEP) (2014)

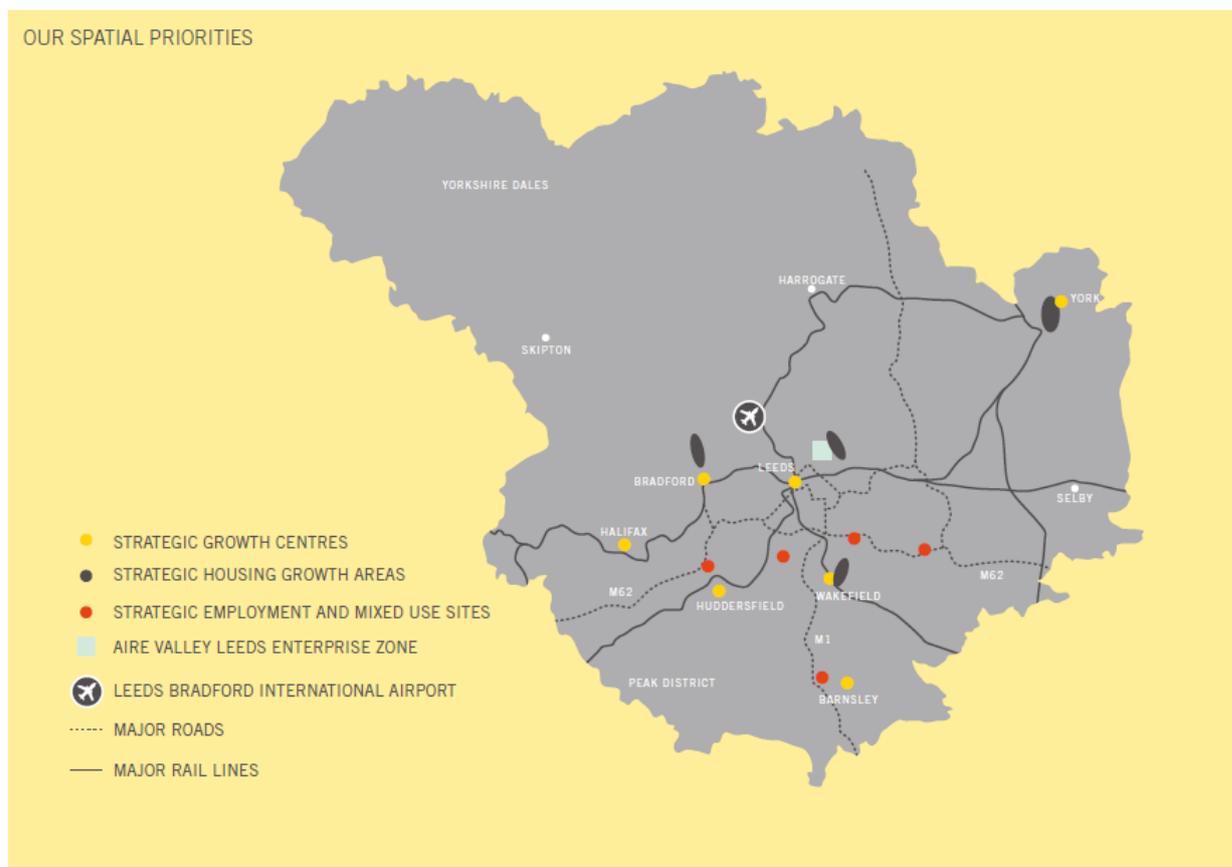
6.6 The Leeds City Region Strategic Economic Plan (2014) sets the economic vision for the City Region as a whole and is a key document in terms of informing the overall strategy to be taken in the Local Plan.

6.7 The vision of the SEP is to unlock the potential of the City Region, developing an economic powerhouse that will create jobs and prosperity.

6.8 Of note are the 'four strategic pillars' upon which the SEP is founded, which are:

1. Supporting growing businesses
2. Developing a skilled and flexible workforce
3. Building a resource smart City Region
4. Delivering the infrastructure for growth

6.9 The SEP identifies Cooper Bridge as one of the region's 'strategic employment and mixed-use sites' (shown red in the extract below). These five major development areas have been identified as strategic opportunities as they combine easy motorway and public transport access with proximity to towns and labour markets.



6.10 The SEP identifies innovative manufacturing as a key industry sector in the City Region, with particular strengths in textile manufacturing and component manufacture, including gears, valves and turbochargers. This is a key growth area for the City Region with a geographic base in the north Kirklees / east Calderdale / south Bradford area.

Kirklees Economic Strategy (2014)

6.11 The Kirklees Economic Strategy (KES) sets the district wide vision for economic performance.

6.12 The KES also notes that Kirklees has one of the biggest concentrations of manufacturing in England, with world leading expertise in gears, valves, pumps and gaskets, along with process and systems engineering, which cut across markets for energy, water, auto-motives, defence, food production and the low carbon economy².

6.13 However, Kirklees also faces challenges, including a relatively low economic output, below average skills, unemployment and disadvantaged communities³. Kirklees therefore has a successful brand, acknowledged skills and expertise, which sit alongside low economic indicators.

6.14 On this basis the KES prioritises precision engineering and innovative manufacturing, seeking strength in both depth and excellence⁴. It seeks £500m of additional GVA and

² Para 3.1

³ Para 3.1

⁴ Para 4.1 Priority 1

increased investment, innovation, exports and embedded local supply chains. To achieve this, a substantial increase in high quality employment land needs to be unlocked⁵. This is supported by a simple analysis of the age of the employment land supply in Kirklees. The UDP was adopted in 1999. It allocated land to meet needs up to 2006. It is therefore 17 years since new land was made available to meet the needs of local and sub-regional businesses, and this includes the last decade where planned needs were not provided for. This is a considerable constraint on supply.

6.15 The KES notes that engineering and manufacturing are also pronounced sectors in neighbouring Bradford and Calderdale and that the sector locally is a priority for the Leeds City Region⁶. The KES aims to make Kirklees the heart of a growing manufacturing and engineering cluster which will see the sector grow at twice the rate of the wider economy, targeting the creation of 3,500 jobs by 2020⁷.

6.16 The actions to achieve this ambition include taking forward an M62 manufacturing hub concept, linked to supply chains, inward investment, exports and innovation; as well as developing strategic employment sites to stimulate job and growth, with a focus on manufacturing and engineering⁸.

6.17 Furthermore, the KES notes that businesses locate to Kirklees for good access to transport, quality, size and affordability of premises and an attractive environment⁹. It states that:

*“Ensuring a good supply of employment land is critical to long term economic growth and to the district’s ability to maximise its locational advantage. Many of our businesses tell us that they need more land to grow. It is vital that they are not forced to look outside the district to find the space that meets their expansion ambitions”*¹⁰

6.18 The KES clearly sets the requirement for the release of high quality, accessible sites in order to meet the growth needs of the district’s businesses. The KES was released in 2014 and, at that point, the document suggests that businesses had consistently informed the Council of a need to grow. In the context of the constrained land supply noted above, this is unsurprising.

6.19 It concludes that:

“New strategic employment sites are needed to increase the volume of land available for employment and key business sectors. This will unlock significant opportunities for new investment and employment and will strengthen the Leeds City Region manufacturing arc that flows through South Leeds, Dewsbury, Batley, Huddersfield, Brighouse and South Bradford”.¹¹

⁵ Para 4.3 Headline Initiatives

⁶ Para 5.1

⁷ Para 5.1

⁸ Para 5.1

⁹ Para 8.1

¹⁰ Para 8.1

¹¹ Para 8.1

- 6.20 The KES clearly links the future success of priority sectors, with strong accessible locations and notes a lack of current land supply to meet the needs of that sector.
- 6.21 This offers the foundations of the identified need to support the release of the site from the Green Belt.

Draft Local Plan Technical Paper: Employment Needs Assessment November 2015

- 6.22 The Employment Technical Paper notes that the KES target is to achieve 75% employment rate by 2020. This matches Kirklees historic high point for employment and is designed to reflect normal economic growth, plus the effect of policies designed to improve employment rates¹².

Jobs Forecast

- 6.23 It is intended to meet the 75% target primarily through growth of the engineering and manufacturing sector¹³ which it is envisaged can increase employment by 1.5% (to 69.2% of total employment), which is around 1/5th of the increase in employment needed to hit the 75% target¹⁴. Other sectoral growth will be seen in the creative, cultural and digital sector, health and social care, leisure, tourism and sustainable food businesses¹⁵.
- 6.24 The jobs forecast adopted in the plan is based on the output of the Regional Econometric Model, modified to assume a 75% employment rate to reflect the aspirations of the KES.
- 6.25 This scenario sees growth of 32,200 jobs by 2031¹⁶ and limits a decline in manufacturing¹⁷, resulting from increased mechanisation, which was more pronounced in the baseline forecast.

Land Requirements

- 6.26 In terms of translating the job forecast into a land requirement, the total jobs forecast for manufacturing is set to decline as a result of reducing labour intensity¹⁸. However, based on the KES objective and the results of the employers survey, the study concludes that if GVA growth in manufacturing is to be achieved, then new prime sites will need to be released. On this basis 44.5 Ha is proposed for release for manufacturing¹⁹.
- 6.27 The total land requirement to provide 32,200 jobs, based on this adjusted calculation is 265 Ha²⁰. This comprises the following sectoral land requirements²¹:

¹² Para 2.16

¹³ Para 2.20

¹⁴ Para 2.22

¹⁵ Para 2.24

¹⁶ Para 4.17

¹⁷ Para 4.16

¹⁸ Para 5.6

¹⁹ Para 5.7

²⁰ Table 2, para 5.3

²¹ Paraphrased from Table 2, Para 5.3

Land Use	Requirement (Ha)
Construction	21.8
Finance & Insurance	1.5
Information & Communication	3.1
Manufacturing	44.5
Professional service	12.5
Public Services	23.3
Transport & Storage	60.9
Utilities	6.5
Wholesale	90.9
Total	265.1

6.28 The 44.5Ha for manufacturing is based on a proportion of the two sub-regionally important sites at Cooper Bridge and Chidswell, both of which are intended to help deliver the strategic objectives for manufacturing and engineering and which are referenced in the SEP.

6.29 However, it is noted²² that there will be a need for a mix of uses on these sites in order to support the primary objective of growing the advanced manufacturing / precision engineering sector. On this basis, storage and distribution, R&D and ancillary office elements will also be required on these sites.

6.30 This suggests the need for more, equally well located land to come forward in support of the advanced manufacturing / precision engineering sector.

6.31 It is also clear that the B8 use classes (Transport, Storage, Wholesale) account for a large proportion of the land required (152Ha).

Take Up and Supply

6.32 Historically, take up levels have been relatively low and most development in Kirklees has been on a relatively small scale. The last major development was in Dewsbury and amounted to 6.25Ha, with most development being small extensions and minor new builds.

6.33 There are two extant permissions, at Lindley Moor and Mirfield. Both are in outline and both will see an element of residential development come forward in order to financially enable the employment uses to come forward²³.

6.34 Along with other sites across the District, there is a committed supply of land which equates to around 2 years of historic take up rate²⁴.

²² Para 5.9

²³ Para 6.8

Quality of Land Supply

6.35 However, there are issues in terms of the suitability of supply. There is a lack of supply of sites that are of a sufficient size for business needs. The employers survey suggests a need for more land which is:

- in close proximity to motorway junctions;
- avoids of congestion;
- has access to a workforce;
- has expansion opportunities;
- has parking provision; and
- an attractive environment²⁵.

6.36 North Kirklees, where the application site sits, is dominated by industrial demand, with proximity to the M62 being a critical factor which offers the greatest opportunity to attract strategic demand²⁶.

6.37 The technical paper notes that whilst Kirklees current employment stock does provide an important resource for the existing SME stock, it's also restricting other economic growth opportunities for the area²⁷.

6.38 The current land supply:

“offers few opportunities to help achieve the overarching economic objectives for the District....

...There has been little significant development in recent years, however, this does not imply a market failure but is more an indication that the right opportunities to bring about more significant development do not currently exist.”²⁸

6.39 A further study by Bilfinger GVA²⁹ surveyed local property agents. All of the agents interviewed considered that there is a lack of well-located high quality employment sites³⁰ and that this reflects national trends, where there is a strong preference for quality sites benefitting from good connectivity, particularly to the strategic road network³¹.

²⁴ Para 6.10

²⁵ Para 6.19, presented in bullet point form

²⁶ Para 6.23

²⁷ Para 6.25

²⁸ Para 7.1

²⁹ The Kirklees Employment Market Strength Assessment, 2015

³⁰ Para 7.2

³¹ Para 7.2

6.40 The survey of agents also concludes that there is local and regionally led latent demand for land and property, but that it is difficult to quantify as there are few, if any, “oven-ready” sites³².

6.41 The technical paper concludes that the objectively assessed need for jobs is 32,200 FTE, which will require a land supply of 265 Ha, with a focus afforded to precision engineering and advanced manufacturing. It notes that:

“Some large flat sites, with good access to the motorway junctions and proximity to a skilled workforce will be required to deliver on these objectives”³³

Employment Land Requirement

6.42 The land supply and requirement position in the Draft Local Plan Technical Paper is put forward as:

	Hectares
Requirement	265
Completions (April 2013- present)	-8
Commitments	-21
Employment permissions on non-employment allocations	-3
10% Flexibility	+23
Windfall from Primary Employment Areas (PEA)	-60
Residual Required	196
Amount to be allocated	262

6.43 This shows that a total amount of 196 Ha of land is required to meet the objectively assessed need, taking into account land carried forward from the earlier plan and committed schemes. It suggests that 262 Ha is taken forward for allocation in the emerging Local Plan.

6.44 The difference between the residual requirement and the amount proposed for allocation is a result of the inclusion of 60Ha of supply from the Primary Employment Areas (PEA). These are existing employment areas which are either largely or completely developed out.

6.45 As such they present a limited opportunity for new land to be developed. Many of the sites do offer potential for small new buildings, or small scale expansion of firms adjacent to gap sites within the PEA and so should form a part of the overall supply. However, many do not share the locational advantages of potential new sites in the area.

6.46 Taking several examples of PEA’s close to the Motorway corridors as examples:

³² Para 7.3

³³ Para 8.1

- Site B&S3 (Oakwell Industrial Park, Centre 27 Birstall, 63.41 Ha) is proximate to the M62 / M621 and has a vacant site with potential for a separate access onto an estate road. However, it is at the rear of the park and is some 2.3Ha in size. At 40% site density it could accommodate a unit of roughly 100,000sqft (around 10,000sqm), although it is triangular in shape which would limit site efficiencies considerably, meaning that a smaller unit would only be achieved in reality. This is an example of a good available site, in a modern context within the PEA. It could feasibly serve local expansion needs but its contribution would be limited and in line with the normal performance of the employment market in Kirklees. It has been visible to the market for some time.
- Site B&S11 (West 26 / Stubs Beck Lane, Cleckheaton, 11.56Ha) is in an excellent and high profile location, at the junction of the M62 and M606, on relatively flat land with good access to markets and a labour force. This would meet the locational requirements set out in the agent's survey undertaken as part of the plan evidence base. However, there is currently no accessible land within the PEA boundary which could accommodate new development. There is landscaping and scrubland between the built development and the motorway junction roundabout which could feasibly accommodate additional development, but it would need to be accessed through either existing development or directly off a busy roundabout with a sub-optimal access arrangement (eg a left in / left out only access). This land has also been visible to the market for some time.
- Site HUD5 (Mama's & Papa's, Colne Bridge, Leeds Road, 6.25Ha) is in a good location, just off Leeds Road with good access to the M62 via Cooper Bridge. There is vacant land in two areas, one within the curtilage of one of the Mama's & Papa's buildings between the warehouse and car parking, which is only really suitable for a very small scale extension, more car parking or some smaller ancillary building associated with the existing operation. The second area is roughly square and around 1Ha in size. At 40% site density it could accommodate a 4,000sqm / 43,000sqft building. Again, this is a small building in a good and well known location. However, similar to the sites above, it is clearly not adequate to deliver the kind of step change in offer which is needed to transform the market. Again this land has been visible to the market for some time.
- Site B&S1 (Grange Road Industrial Estate, Batley, 14.22 Ha) is removed from the motorway network but has moderate access to the M1 Motorway via Ossett in Wakefield District. It has one vacant area which is roughly rectangular and bounded to its east and west by industrial development and it north and south by residential development. It has no road frontage but there is a dirt track which runs between Mill Forest Way and Fort Ann Road, which is not suitable for vehicular access. This site is 0.65 Ha and at 40% site density could accommodate a building of around 2,600sqm / 28,000sqft. Given the access constraints, this building capacity could only feasibly be used as an extension to the adjacent building. Again, this theoretical hectareage could only serve a local / churn based need.

6.47 As can be seen, the PEA sites in good locations are sites which have constraints to development, are well known in the current market and, given the age of the current land supply, do not present a new resource for businesses seeking new accommodation for an expansion or relocation to a prime position. Whilst they add a theoretical capacity to the land supply in the District, they are clearly not suitable to drive forward a transformational policy approach which looks to increase the overall employment rate to 75%.

6.48 As such we consider that the PEA's are:

- (i) Not a reliable source of supply. Many are constrained, small and in remnant locations within the wider sites following development of the better parcels of land.
- (ii) Most suited to the expansion of existing businesses, particularly those within the PEA already. Some are so constrained that they can only meet a direct extension need, whilst others may be suited to smaller businesses in new units, but are still fundamentally constrained sites even within the better located PEA's.
- (iii) Offer nothing new to the market. These are not new employment sites. They have been available to the market for a considerable period of time. Their lack of development suggests that whilst they theoretically exist as supply, they are not likely to be taken up quickly or enthusiastically by the latent demand identified in the evidence base. If they were attractive to that demand, they would have been taken already.
- (iv) Unlikely to help drive the economic change sought by the Council's Economic Strategy. For the reasons set out above, the PEAs' will not meet the need for new, strategically located and good quality sites identified as what is needed in order to drive Kirklees' economy forward. The market needs fresh, top quality sites, rather than a theoretical supply based on old sites which may be suitable for employment use, but which are not the best available to meet modern requirements. The need for new strategic sites is consistent with the evidence base and a quick analysis of several opportunity sites in the PEA's supports this view.

6.49 On this basis, we consider that the decision to recognise their existence in the technical paper and plan is correct, but that this source of supply cannot be relied on to stimulate the growth which is needed to drive the Kirklees economy towards a 75% employment rate.

6.50 A greater choice of top quality sites which will meet industry requirements for large flat sites with good access to the motorway network and a skilled workforce is needed. The proposed allocation of 66 Ha of additional land is considered to offer this choice and flexibility to the market in the absence of such opportunity from the PEA sites.

Market Activity

6.51 Dove Haigh Phillips was commissioned in March 2013 to prepare an Employment Land Development Strategy for the Cooper Bridge site. This report has since been updated

with the production of a Position Statement (June 2015) outlining the need for new employment land in Kirklees.

- 6.52 Following many years of recession, the level of occupier and investor demand for good quality industrial stock within the North of England, particularly along the M62 corridor and within Kirklees, has increased significantly. There is increasing construction activity within the West Yorkshire industrial market, which is particularly evident in the Leeds Aire Valley Enterprise Zone and at Wakefield.
- 6.53 Dove Haigh Phillips, who are advising on this scheme, have recently noted that buildings in excess of 100,000 sqft are receiving an increasing level of occupier capital investment. In particular, two significant warehouse developments have been approved in Wakefield – one at Trinity Farm (approximately 1 million sqft) and the other at Normanton Industrial Estate (approximately 600,000sqft). Companies are also resorting to installing mezzanine floors in their distribution/warehouse buildings to optimise cubic content, rather than just floorspace. This is evidenced by the Marks and Spencer warehouse in Bradford (1.1 million sqft) and TK Maxx at Knottingley (650,000 sqft), both of which are capable of expanding by 3 times their floor plate through the use of mezzanines.
- 6.54 Despite this, there has been very little development of quality industrial stock, particularly along the M62 corridor in Kirklees. The employment technical paper notes that this is a result of a lack of land supply, rather than a market failure.
- 6.55 This trend of rising demand is likely to be sustained into the foreseeable future, with no indication that there is likely to be a reduction.

Need Conclusions

- 6.56 It is clear that Kirklees has an existing supply of employment land which is available and in some cases subject to extant permissions. However, that supply is generally old and either does not meet modern requirements or has simply not been delivered. It is known supply to the market and does not offer a new opportunity for economic growth. Other alternative sites are considered further below.
- 6.57 The lack of good quality land supply has constrained economic growth. Low take up has not been a result of a market failure, but reflects the fact that the right kind of land is not available to meet current business requirements. New land is required to address this need.
- 6.58 Market research has suggested that new sites need to be close to the motorway, relatively flat, close to an appropriate workforce, avoid congested routes and be set within an attractive environment, which would include providing for expansion and adequate car parking.
- 6.59 There is a supply of substandard land which will not meet these needs³⁴. It remains appropriate to retain this land for employment purposes as it will allow for the “normal” functioning of the local market. It will not, however, achieve the objectives of the Economic Strategy, which should be the primary purpose of the plan.

³⁴ See our analysis of PEA sites above.

- 6.60 To allow enough land to come forward to achieve the economic transformation envisaged in the Kirklees Economic Strategy additional land is considered to be needed.
- 6.61 The adjusted economic modelling suggests that this need amounts to 262 Ha in total, with around 44.5ha of this dedicated to precision engineering and advanced manufacturing; and around 152ha dedicated to distribution and logistics space.
- 6.62 These markets are linked and reliant, in part, upon each other. They also share locational requirements.
- 6.63 It is clear that there is an economic need which is not currently being met. It is also clear that this need has not been met for some considerable time. Whilst agent's surveys have not quantified the latent demand in the market, there is consistent messaging from qualitative survey work that a lack of suitable land supply is a considerable barrier to economic progress.
- 6.64 The Core Strategy sought to address this long standing need, but was withdrawn as a result of housing supply issues. This has served to further delay the delivery of a new land supply. The draft Local Plan is seeking to address that now, although it is clear that new land will not be formally released for around 18 months to 2 years from the time of writing³⁵.
- 6.65 We consider that this need has been unmet for a considerable number of years as the UDP allocated land up until 2006, now some 10 years ago. This is a considerable period to have no planned means of meeting the needs of the economy. New land has not entered the market since the UDP was adopted in 1999.
- 6.66 In this context we conclude that there is a clear need to release land to meet economic development needs, both in the short term and during the remainder of the plan period.

Alternative sites

- 6.67 The identified need is for a considerable amount of land, much of which will be required in the motorway corridors in order to meet the locational requirements of the growth markets identified in the SEP and KES. The availability of land in Kirklees is significantly affected by topography, particularly at the western side of the District. With both motorway proximity and topography taken into account, the options to accommodate growth for this market are extremely limited.

Availability of Alternative Brownfield Sites

- 6.68 It is considered that no urban brownfield sites in Kirklees are capable of delivering a strategic employment site which fulfils the economic aims and objectives of the Economic Strategy (2014) to the same extent as Cooper Bridge when taking account of its size, location and connectivity with other established employment uses. We have analysed some of the better located Primary Employment Area sites³⁶. These sites are not likely to offer a reliable source of supply, are not new to the market and are not adequate to meet the identified levels of need.

³⁵ The 2014 Local development scheme envisages adoption of the Local Plan in late 2017

³⁶ See Paragraph 6.46

6.69 It is not possible to accommodate the level of growth associated with meeting the KES aims on previously developed land. It is therefore necessary to look at greenfield options.

Availability of Alternative Allocated Sites

6.70 There are two allocated employment sites which are well located and close to the motorway network. These are at Slipper Lane, Mirfield (to the east of Cooper Bridge) and at Lindley Moor. Both of these sites have recently approved planning permissions for a mix of employment and residential development.

6.71 There is therefore a committed supply of land which is broadly capable of meeting immediate needs. However, on the basis of average take up, these consents will provide only a fraction of the land needed to ensure a steady supply of good quality land to the market.

6.72 The Local Plan technical paper notes³⁷ that 10 ha of land has been taken up on average every year since 2004-5. This is a “policy off” average, which reflects the average performance of the market over a 10 year period. Notably, at least 8 years of the monitoring period of 2004-2014 was after 2006, which is the end point of the UDPs planned land supply.

6.73 A 10ha take up represents a footprint for this type of development³⁸ of some 40,000sqm (430,556sqft). These two sites have consent for a total of 36,742 sqm (395,487sqft) of space. These sites therefore represent only 91% of a single years’ supply based on historic take up rates.

6.74 However, this calculation represents take up in a “policy off” scenario and notably covers a period when the supply of prime sites has been significantly limited, thus limiting the potential for take up through supply constraint.

6.75 To illustrate this, the emerging Local Plan covers the period 2013 to 2031 (18 years) and proposes to allocate 262Ha. On an annualised basis, this equates to 14.5Ha per annum. These sites would therefore only equate³⁹ to 63% of a years’ supply in the “policy on” scenario.

6.76 These older UDP allocations are clearly not adequate to meet the identified need. It is therefore necessary to examine a Green Belt release in order to meet needs.

Review of Cooper Bridge

6.77 Cooper Bridge presents a fairly unique development opportunity in the plan area. It is drawn out specifically in the City Region Strategic Economic Plan as a strategically important site. This is a result of a number of factors which we set out below.

6.78 The evidence base for the plan identifies key factors which are absent in the current land supply, and therefore define a good quality employment site. These are motorway

³⁷ Table 3 at paragraph 6.3

³⁸ 10Ha = 10,000sqm x 10 at 40% site density = 40,000sqm pa / 430,556sqft pa

³⁹ 14.5Ha = 10,000sqm X 14.5 at 40% site density = 58,000 sqm pa / 624,307 sqft pa

accessibility, avoiding congestion, access to a workforce, having expansion opportunities, parking and an attractive environment⁴⁰.

6.79 For a site which is able to attract the key areas of growth, namely advanced manufacturing and logistics, we also consider that a site needs to be deliverable and in the case of advanced manufacturing, to offer a critical mass of similar business activity, on site or within very close proximity.

6.80 Cooper Bridge meets each of these criteria.

Motorway Access

6.81 The site is at the heart of West Yorkshire's manufacturing centre, being proximate to a workforce and consumer population. It is well connected to the M62 and is relatively close to the M1.

Avoids Congestion

6.82 Resolving on going highways issues at the Cooper Bridge roundabout is a priority highways scheme for both the District and the City Region. Once this improvement is in place, the site will also avoid congestion.

6.83 The roundabout improvements have been identified as a top priority for the West Yorkshire plus Transport Fund, which targets infrastructure schemes that can demonstrably increase employment and economic growth across the area. The very fact that the Cooper Bridge junction will secure the necessary funding demonstrates the economic potential of land in this part of Kirkees.

6.84 The allocation of a large employment site will help to validate funding decisions. The presence of a large employment site and the associated economic benefits it brings, will add weight and confidence to a decision to commit that funding and actually commence works on the ground.

Access to a Workforce

6.85 The site has excellent access to the work force located in east Huddersfield, south eastern Calderdale, south Bradford and the range of smaller settlements around the Mirfield / Cleckheaton / Dewsbury area.

Parking, Environment and Expansion

6.86 The site is of a suitable scale to offer good levels of parking and an attractive environment, whilst also retaining expansion opportunities.

Deliverability

6.87 Cooper Bridge is under the ownership of two parties, the Kirklees Estate and Keyland Developments Ltd, who are operating in partnership to deliver the site. The site does

⁴⁰ Paragraph 6.19 of the Employment Technical paper.

not have to contend with the complexities associated with having a large number of landowners and interested parties, as can often be the case with a site of this size.

- 6.88 Market conditions and a lack of supply over a considerable period of time is creating growth in both rental and capital values. Compared to previous market conditions, the value of land on motorway corridor sites is much higher where planning permission is achieved.
- 6.89 The level of certainty associated with landownership and the confidence arising from present market conditions, demonstrates that delivery of the site would be extremely likely should an allocation be forthcoming.

Critical Mass

- 6.90 The site is large enough to accommodate a range and mix of uses and to provide for a localised cluster of advanced manufacturing activity, including for supply chain businesses. The site is also strategically located to sit at the heart of the “manufacturing arc” which will facilitate ease of access for the related businesses which are anticipated to help drive growth during the plan period.
- 6.91 The development of the site would also result in a natural extension to the core of Kirklees Council’s main economic area, the ‘Leeds Road Corridor’ which runs along the A62 from Huddersfield Town Centre. This area is recognised in the Kirklees Economic Strategy as a strategic corridor which links Huddersfield and Dewsbury and is expected to be a focus of innovative growth and built fabric improvements.

Other Economic Outcomes.

- 6.92 Based on the floorspace achieved on the indicative site master plan (totalling 161,187m² Gross Internal Area) and on a 50/50 split between B2 and B8 uses, initial calculations indicate that approximately 3,250 jobs⁴¹ could be created on site.
- 6.93 This will offer a meaningful contribution (10%) to the calculated need for 32,200 jobs set in the employment land technical paper,

Overview

- 6.94 It is considered that Cooper Bridge is an ideal location for meeting the identified market need as set out in the City Region and District Economic Strategies, as translated into evidenced local requirements in the Employment technical paper.
- 6.95 It is considered that this site is a high performing site when considered against the identified need. In its own right it is not capable of meeting the anticipated job growth required by the evidence base, As such it will need to form part of a suite of sites which are directed towards the key growth sectors for the plan period.

⁴¹ Calculated based on 80,593.5m² of B2 usage at 36 m² per FTE (full time equivalent jobs) and 80,593.5m² B8 usage at 80 m² per FTE, using the guidance contained within the Employment Densities Guide (2nd Edition) 2010, prepared by OFPAT, HCA and Drivers Jonas Deloitte

Green Belt Purposes

6.96 The NPPF sets out five purposes⁴² of the Green Belt. These are:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.97 The Draft Local Plan Green Belt Review and Outcomes Report is currently subject to consultation. It assesses sites against physical constraints and criteria which broadly mirror the purposes of including land in the Green Belt, although it does not include the final criterion (to assist in urban regeneration, by encouraging the recycling of derelict and other urban land).

6.98 The extract below is taken from Appendix 4a of the Report, and sets out the outcomes for Cooper Bridge. It identifies that the constraints are a high pressure gas pipeline, the presence of a watercourse (Nun Brook), protected trees and flood zones 2 and 3a. Its conclusion is that development of the site would have a limited impact upon openness, but that there is a necessity to retain Green Belt separation from the adjacent Calderdale district to the west.

Ref.	TEST 1: CONSTRAINTS			Existing use	TEST 2: GREEN BELT PURPOSES				Conclusion	Test 2 score
	1a Topographical	1b Physical	1c Environmental		2a Prevents merging	2b Checks Sprawl	2c Safeguards from encroachment	2d Preserves setting & character		
Cooper Bridge										
CB1	None	High pressure gas pipeline, Nun Brook	High pressure gas pipeline buffer, protected trees, flood zones 2 and 3a	Grazing land, Kirklees Park	Restricted gap with green belt in Calderdale	Trees, track, roads and existing development provide containment.	Part of wider countryside	Listed buildings	Development could have limited impact on openness but necessity to retain green belt separation from Calderdale	3

6.99 The table below sets out further information on the performance of the site against these tests.

Test no.	Green Belt Edge Review Criterion	How Cooper Bridge Complies with those Purposes?
1a	Topographical constraint	The land rises from 50 metres Above Ordnance Datum (AOD) to 75 metres AOD to the north east and 60 metres AOD to the north.

⁴² Paragraph 80

		Development plateaux will be created to facilitate the built form. It is considered that there is no significant topographical constraint.
1b	Physical constraint	<p>The site to the north of the A644/A62 is crossed by Nun Brook, which feeds into the River Calder to the south.</p> <p>A high pressure gas main also runs through the site, although the majority of its length is along a site boundary.</p> <p>Both of these constraints will be protected as part of any future development proposal.</p>
1c	Environmental constraint	<p>The site is not located within or adjacent to Areas of High Landscape Value. There are no ecological or landscape designations on the site.</p> <p>The areas running along the line of Nun Brook are subject to flooding, as is the waste water treatment works land. The main area of flood risk is on land which is not in the Green Belt. A small area of flooding does occur in the area of the site in the Green Belt, although this is a very small proportion of the site overall. The overall risk of flooding on the site can be controlled through the provision of surface water attenuation and selective land raising and if needed associated compensation.</p> <p>Any future master planning will need to recognise existing site features and seek to incorporate these or replace them in within or around the site.</p>
2a	To prevent neighbouring towns merging into one another.	<p>The urban areas of Mirfield, Bradley and Huddersfield have already coalesced to an extent.</p> <p>The key strategic area of separation between settlements is the gap between Halifax/Clifton/Elland and Huddersfield/Mirfield/Batley. There has been some erosion of the gap between these 2 main conurbations and the remaining gap continues to be strategically important. The gap between Mirfield and Clifton is currently around 1.9km, measured from the water treatment works. From the northern most point of the site, there will still remain a gap of some 1.3km between Mirfield and Clifton. However, their separate identities as settlements are defined less by this separation distance than the nature and form of the intervening land and vegetation. The M62 sits</p>

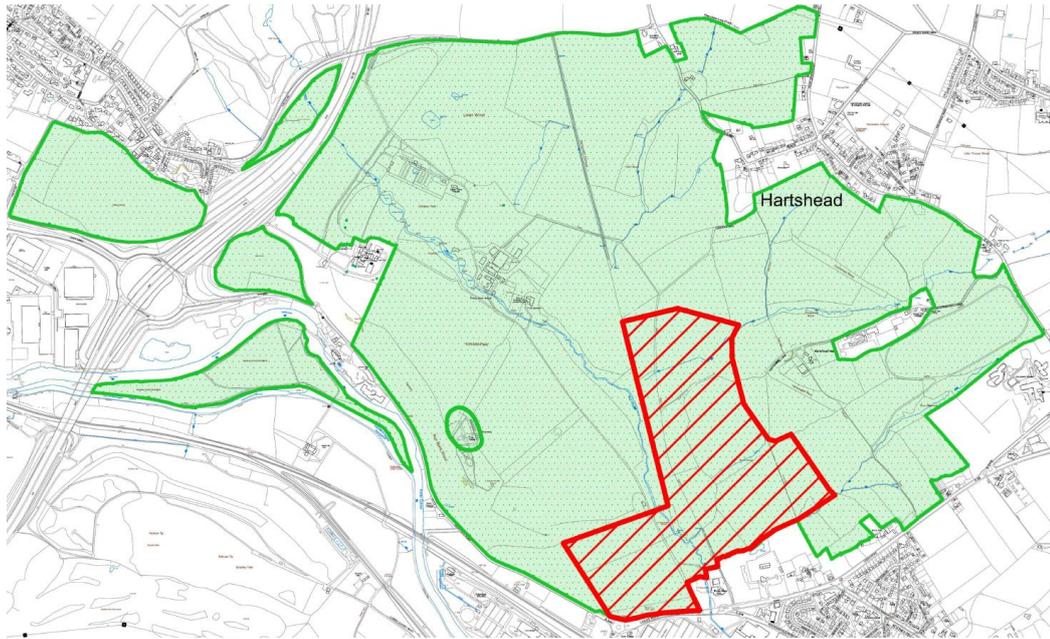
		<p>almost at the high point between these settlements and marks a distinct topographical watershed between the two settlements. Clifton sits higher up to the north but has no visual connectivity with Mirfield, whilst Brighouse sits much lower down to the north, again with no inter-visibility. The site sits to the south of this ridge, on land sloping up to the north, but still much further down than the line of the M62.</p> <p>The development of this site may erode the separation distance between these settlements, but will not threaten the distinct settlement identities due to intervening land form which helps to define this strategic Green Belt gap.</p> <p>More locally, the release of the site would further reduce the separation between Hartshead and Mirfield. However a gap of some 500m would still remain. The use of topography to define the site boundaries nearest to Hartshead helps to retain the development on lower ground beneath the village which in turn helps to maintain the separate identity of Hartshead, rather than relying on existing boundary features, which could further erode the sense of separation.</p> <p>The development of the site would not result in any settlements merging and whilst it would reduce the distances between settlements, there will not be a significant change in terms of these settlements becoming less distinct.</p>
2b	To check the unrestricted sprawl of large built-up areas.	<p>Development of the site will result in the extension of the existing built up areas of Bradley and Mirfield. However, it is inevitable that any Green Belt release will result in some level of encroachment on the countryside.</p> <p>The site is well defined by existing features and topography and further strengthening of boundaries will be undertaken to protect against future pressure to develop the surrounding Green Belt land. This is considered in further detail below.</p>
2c	To assist in safeguarding the countryside from encroachment.	<p>It is inevitable that a Green Belt release will result in encroachment into the countryside. The harm caused as a result must be balanced against other considerations, including the benefits of meeting an identified need.</p>
2d	To preserve the setting and special character of	<p>There is historic development in the vicinity of the proposed site, but no historic towns. This purpose</p>

historic towns.	is specific to settlements like York and Cambridge where compact urban form is essential to their character as historic cities. Therefore, this is not considered to apply to the Cooper Bridge site. The assessment notes that there are listed buildings in close proximity, and there are other nearby heritage assets. However, there will be no direct effect on most of these assets and their setting can be preserved. There is one listed structure that may be affected, although this can be relocated with minimal harm to its inherent value.
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- 6.100 It is considered that the site does perform Green Belt functions to a degree. However, its development will not erode the strategic gap between Mirfield and Clifton / Brighouse, which it is considered is the most critical function in this area.

Boundary Review

- 6.101 NPPF advises that Green Belt boundaries should be defined clearly, using physical features that are readily recognisable on the ground and likely to be permanent. The site boundary follows some clearly defined on-site features, such as field boundaries, woodland edges and built development. However, there are other boundaries in the northern and eastern part of the site that cut across fields, which are not physically defined. These boundaries follow contour lines.
- 6.102 This approach has been adopted to help ensure that the site sits well in the landscape, reduced visual effects and does not reduce the perception of separation between Hartshead and Mirfield.
- 6.103 It will therefore be necessary to create new boundary features which will protect the surrounding land from future development pressure.
- 6.104 Consequently, it is proposed to create significant tree belts along (and beyond) the site boundaries. This will help with both defining the boundary and screening the development in views from isolated dwellings and users of footpaths in the area.
- 6.105 The Kirklees Estate owns land beyond the defined site (see plan below), which enables control over planting in these areas, providing a degree of certainty as to the delivery of that planting.



6.106 The above drawing shows land under the ownership of Kirklees Estates in green and the proposed employment site hatched in red.

6.107 Notwithstanding the above, there are factors that naturally limit development beyond the presently undefined northern and eastern boundaries. In order to gain access to more land to the north, the infrastructure costs significantly increase as do topographical constraints. This means that only smaller units can be accommodated on smaller platforms, which taken alongside additional servicing costs, both through the provision of additional road and utilities connections, mean that it soon becomes uneconomic to service the land.

Green Belt Overview

6.108 This review has found the following key points:

- The City Region SEP considers this to be a strategically important site for delivering regional economic growth.
- The KES notes a sub-regional strength in advanced manufacturing, but also found corresponding challenges; including low economic output, poor skills and high unemployment. Growth in advanced manufacturing is considered to be the primary opportunity to reverse these challenges.
- The KES clearly links a supply of good quality accessible land, with the achievement of economic growth.
- The Local Plan technical paper identifies a need to allocate 265 Ha of land for the plan period.
- There is currently a land supply of around 2 years' worth of need, although better quality sites account for less than a year's supply.

- The UDP planned a land supply until 2006, so there has been no means of meeting newly arising or forecast needs since then. It is now already nearly 3 years into the current plan period. The existing land supply does not even meet needs which have already arisen in the current emerging plan period.
- There is therefore a pressing need to release more land for development.
- There are no alternative brownfield sites which could meet the identified needs in terms of either quantum of land or the required quality.
- There are existing allocated sites, which are non-Green Belt, but these will provide for less than 1 years equivalent of supply. They are not adequate in terms of quantum.
- There is therefore a major shortage of land available to meet the identified need.
- This necessitates the removal of land from the Green Belt.
- The site does perform Green Belt purposes to a limited degree. The separation between settlements would reduce as a result of development on this site. However, it will not result in settlements joining together. Similarly, there will be encroachment into the countryside, but it will be restricted by land form. Having established that there are no alternative non-Green Belt sites which are capable of meeting the identified need, release of this land would not undermine the recycling of urban land.

6.109 On this basis, we consider that the following exceptional circumstances apply, which justify the release of this site from the Green Belt:

- Need for more employment land
- Absence of supply in non-Green Belt locations
- Lack of harm to the purposes of including land in the Green Belt.

7. Other Planning Considerations

- 7.1 A number of reports and studies have been prepared to inform the potential release of this site from the Green Belt. The findings of these reports are set out below.

Historic Environment

- 7.2 A Cultural Heritage Assessment has been undertaken. The Draft Allocations and Designations Local Plan consultation document identifies a constraint as the *'impact on Grade II Registered Historic Park and Garden and Kirklees Hall – including other designated heritage assets.'*
- 7.3 There are a large number of heritage assets in the vicinity of the site, some of which are of very great importance archaeologically, architecturally and culturally. The report identifies a range of impacts, although the vast majority are not direct impacts and mitigation is recommended in the form of enhanced or retained screening. This reduces the assessed harm to acceptable levels.
- 7.4 Depending on the detail of the highways improvements required at the Cooper Bridge roundabout, there may be a direct effect on the dumb steeple situated on Wakefield Road, although this has already been moved to accommodate development. The significance of this effect would be limited to slight, provided that it is locally re-positioned with appropriate interpretation information provided.
- 7.5 Historic England (HE) have been consulted during the preparation of the assessment work and are in broad agreement with the proposals and approach. HE remain involved in the future development and are supportive of the principle of introducing employment development on this site.
- 7.6 We consider that whilst there will be a heritage effects arising from the development of this site they will be limited in nature, subject to future detailed proposals.

Transport

- 7.7 The Draft Plan identifies that a 'highway improvement' is required and that public rights of way cross the Cooper Bridge site.

Highway improvement

- 7.8 The Cooper Bridge Junction improvements are included in the Core Package of the committed West Yorkshire plus Transport schemes. These schemes are considered to be deliverable and affordable within 10 years and would give the best return on investment by maximising economic impacts. The latest programme indicates delivery of the junction improvement by 2020.
- 7.9 The existing A644/A62 junction is located on two key transport corridors, which is currently a source of congestion and delay - particularly during the peak periods. Given the strategic location of the junction at the intersection of two important transport corridors (the A644 and the A62) close to the M62, it is now recognised that the need for a major improvement is crucial.

7.10 It is clear that a significant amount of feasibility work has already been undertaken by the Council in the design and promotion of the scheme. The implications of the proposed improvements for the adjacent employment land uses have been considered and the following is concluded:

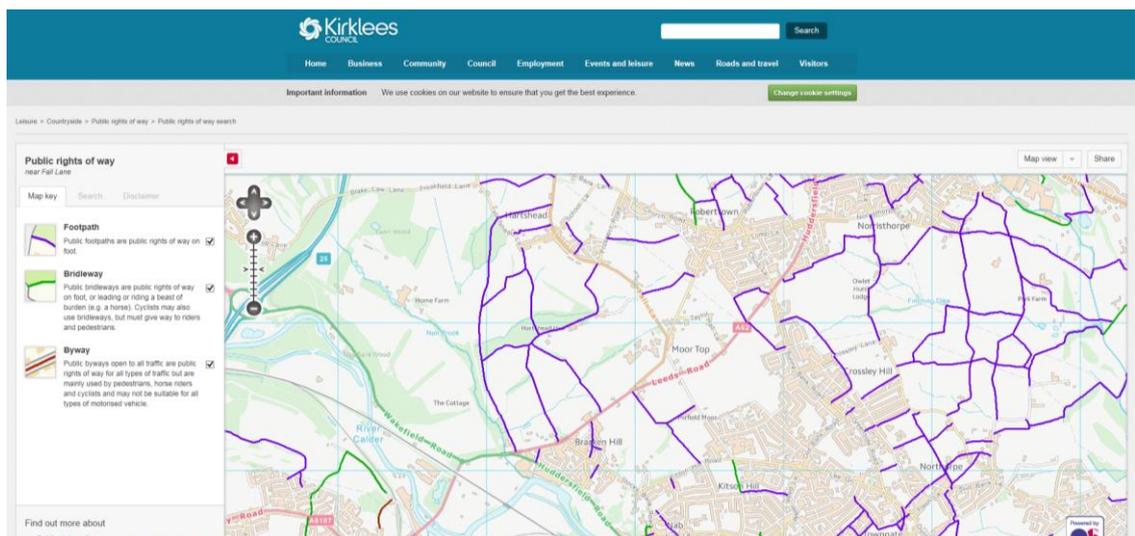
- The scale and form of improvement will overcome existing problems of congestion, creating capacity to accommodate traffic generated by the adjacent development sites.
- It forms a high quality gateway which would be attractive to end users and act as a catalyst for growth.
- The layout offers the opportunity to incorporate priority for public transport, which will enhance the sustainability of the employment sites and improve connectivity for employees.
- Its proximity to Junction 25 of the M62 is seen as a locational advantage, which is likely to be attractive to operators.
- The proposed improvements are deliverable within the required timescales.

7.11 The opportunity therefore exists to deliver an infrastructure strategy at Cooper Bridge which overcomes existing problems and helps to achieve the objective of employment and productivity growth in Kirklees.

7.12 Providing these improvements are delivered, the highway network will be more than capable of accommodating a large strategic employment site in this location.

Public rights of way

7.13 A number of public rights of way run across the site these are shown below:



7.14 These routes may need to be diverted within or around the site as part of detailed proposals. Subject to suitable master planning of the site, these can be incorporated into the scheme in a way which does not make them less conducive to users.

Landscape and Visual Impact

- 7.15 The site is already well screened from most public vantage points, other than the rights of way which cross the site. The future development of the site will need to provide a landscape strategy which is aimed at mitigating the visual impact of the development and creating robust and defensible boundaries that will protect the surrounding Green Belt from further development pressure.
- 7.16 Any large scale development will have an effect on landscape character. However, the impact can be mitigated because the land beyond the site is owned by Kirklees Estates and therefore additional planting can take place in this area.
- 7.17 The strategy will take into account the potential to make use of different development plateau levels, the scale of likely development and the use of screening vegetation. Careful landform design will be employed and the retention of strategic woodland blocks and intervening vegetation will be important factors in informing the overall master-plan as well as helping to respect the integrity of the historic landscape associated with Kirklees Park.
- 7.18 The following principles will inform the development scheme:
- careful retention of existing landscape elements, wherever possible
 - sensitive siting of large scale units, including sensitive use of levels
 - use of appropriate materials and building forms
 - a comprehensive landscape strategy designed to screen the site from view (so far as it is possible) on its boundaries, with planting permeating through the site itself
- 7.19 It is considered that a development of the site can be achieved which respects existing views, does not harm visual amenity and which minimises the effect of the development on the historic environment and landscape character,

Biodiversity

- 7.20 The southern part of the site has few features of interest as it is previously developed and remains in use as a water treatment works. However, part of the site to the north is UK BAP Habitat. Future development proposals will have a minimum of 10m stand off, with planting, on the River Calder to protect otters.
- 7.21 A Preliminary Ecological Appraisal has been prepared which assesses the potential ecological constraints and opportunities. It is based upon a desk study of designated wildlife sites and records and an extended Phase 1 Habitat Survey that was carried out in December 2015. Further detailed survey work will need to be carried out at later stages of the process.
- 7.22 Due to the characteristics of the site, it is likely to support badger setts and there is potential for it to contain features of value to local bird and bat populations. Further

survey work is recommended to determine whether these species are present on the site and, if so, to define suitable mitigation.

- 7.23 Such mitigation measures may include the provision of trees and other forms of planting, the retention and enhancement (where possible) of Nun Brook (which runs through the site), the provision of new landscape and water features to ensure that biodiversity is maintained throughout the site and the provision of bat and bird boxes on or adjacent to the proposed built development. This mitigation is considered to be reasonable and deliverable if necessary.
- 7.24 Whilst there will be mitigation required in order to ensure that a development doesn't adversely affect biodiversity, this mitigation is likely to be effective such that ecological issues do not preclude development in this location.

Air Quality

- 7.25 The Draft Plan identifies that Air Quality and Odour assessments are required.
- 7.26 The southern section of the site lies within an Air Quality Management Area (AQMA). The background pollutant levels for the site, as a whole, are well below the annual mean air quality objective. However, vehicles generated by development on the site will pass through the AQMA and thus could affect air quality in the local area.
- 7.27 There is a possibility of elevated concentrations or exceedances of the air quality objectives of Kirklees AQMA, it is considered that various mitigation measures would reduce this impact, including:
- A green travel plan;
 - Sustainable transport strategies;
 - Electric vehicle charging points; and
 - An air pollution damage cost calculation
- 7.28 The works proposed to improve the Cooper Bridge roundabout are likely to have a positive effect on the pollutant levels in the area as well, as this will reduce the amount of stationary traffic in the area, which is often a great contributor to elevated pollutants. This combined with the travel reduction measures outlined above should result in either an improvement in air quality in the area, or a neutral effect once the development is complete.
- 7.29 It is likely that impacts from construction dust can be mitigated such that there will be a negligible impact on nearby receptors. Such tried-and-tested mitigation measures may include water suppression, the re-vegetation of earthworks and exposed areas to stabilise surfaces, the storage of materials in bunded areas, and the use of water-assisted sweepers.

Noise

- 7.30 Initial noise assessment work suggests that the net increase in road traffic as a result of the proposed development at the site may result in a small increase in noise at some nearby existing residential properties, although this is not likely to be a perceptible change.
- 7.31 Mitigation measures to manage noise generated by commercial buildings, including plant and yard activity are suggested, which include the potential to include a variety of noise attenuation measures, including building and plant orientation, noise barriers and attenuated plant. These measures are likely to ensure that the development can proceed without affecting residential amenity.

Contamination

- 7.32 The Draft Plan notes that the site is close to a high pressure gas pipe, two mine entrances have been identified and an assessment of potential contamination will be required for any future development proposals.
- 7.33 Initial ground conditions work suggests that both the present uses and a range of historic uses on the site do create the potential for contamination to be present.
- 7.34 There is likely to be made ground as a result of former shallow and deep mining activity. The Three Nuns Pit was a shallow mine to deep mine and there are four shafts and adits on the site. Any ground settlement associated with deep mining should have already occurred, although there may be remaining instability from shallower workings which will need to be investigated and remediated. There is also an active Waste Water Treatment Works and electricity substation, as well as several records of discharge consents, pollution controls and pollution incidents within influencing distance of the site. There are also potential asbestos containing materials in buildings on the site. These sources will need to be investigated further, but they present a low to moderate risk of contamination.
- 7.35 There are surface and ground water resources present which may be affected by mobilisation of any pollutants during works. These will need to be protected through employing best practice measures during construction.
- 7.36 In respect of the 'high pressure gas zone' that is identified within the Draft Local Plan, there is a significant gas main running north-south through the site. Initial consultation with the Gas Authority has indicated that the gas main could remain in situ, provided that 10m easements from the centre line of the mains are maintained. This requirement has been incorporated into the masterplan proposals shown on the plan in Section 3 above (the alignment of the gas main is shown as a dotted green line).
- 7.37 Whilst further investigation work will be required, the initial assessment work has not found any issues which are likely to mean that the site is not suitable for development, provided that suitable mitigation measures are put in place.

Flood Risk

- 7.38 The northern part of the site, which consists of agricultural land, is mainly in Flood Zone 1. The southern part, comprising the WWTW filter beds, lies mainly in Flood Zones 2 and 3.
- 7.39 The Nun Brook flows from the north through the northern part of the site where it is joined by another minor watercourse from the east. The River Calder flows along the boundary of the southern part of the site.
- 7.40 The planned commercial/industrial use is classified by the NPPF as 'less vulnerable' to flood risk.

Fluvial Flood Risk

- 7.41 The northern part of the site lies mainly in Flood Zone 1 where all forms of development are appropriate. There is a small area of Flood Zone 2 where commercial/industrial development is appropriate but subject to the Sequential Test.
- 7.42 The southern part of the site lies mainly in Flood Zone 3 where commercial/industrial development is appropriate but, again, subject to the Sequential Test. In the southern part of the site, it is proposed to remove the 4m high filter bed structures and replace them with an equivalent volume of imported fill sufficient to raise floor levels above the potential flood level. A possible source of fill for this would be surplus material from the site formation earthworks in the northern part of the site.

Surface Water Drainage Strategy

- 7.43 Surface water drainage design would employ SuDS techniques for flow attenuation and treatment and follow the hierarchy set out in the Building Regulations, namely, infiltration followed by discharge to watercourse with discharge to sewer being a last resort. Although infiltration would be investigated, it is considered unlikely that the geology will be sufficiently permeable. However, discharge to the Nun Brook and/or the River Calder will be feasible. There are no suitable surface water sewers available, so discharge to sewers will not be possible.
- 7.44 A feasible technique for flow attenuation and treatment may be permeable paving in the car parks. The full range of SuDS options will be examined in detail at later stages and appropriate measures included to ensure there is no risk of flooding off site.

Foul Sewerage

- 7.45 Yorkshire Water has confirmed that a foul discharge connection may be made to the 300mm diameter public combined sewer in Huddersfield Road about 200m to the east.

Summary of technical issues

- 7.46 A range of technical work has been undertaken to a level appropriate to support the allocation of this site.
- 7.47 None of the reports have found any issues which suggest that the development could not be achieved, provided that suitable mitigation measures are in place. Further

detailed work will be needed at later stages of the process to inform the precise form of the development and the need for mitigation.

7.48 However, it is clear that development on this site is feasible and deliverable within the plan period.

8. Conclusions

- 8.1 This representation has been prepared by Turley on behalf of Keyland Developments Ltd and The Kirklees Estate. It supports the allocation of the Cooper Bridge site as Kirklees' primary strategic employment site.
- 8.2 The land to the south of the Cooper Bridge junction is an existing developed waste water treatment works site that is coming to the end of its operational life. As an existing developed site, its development for new employment uses would be supported by local and national planning policy.
- 8.3 In relation to the Green Belt land comprising the northern part of the site, it has been demonstrated that the following exceptional circumstances justify the release of the site from the Green Belt:
- Need for more employment land
 - Absence of supply of non-Green Belt alternatives to meet the need
 - Relative lack of harm to the purposes of including land in the Green Belt.
- 8.4 It is also clear that the site is deliverable within the plan period, as there are no technical constraints to development which cannot be overcome within the plan period.
- 8.5 Overall, it is concluded that the Cooper Bridge site offers a unique and significant opportunity for the Council to deliver against the aims and objectives of its Economic Strategy 2014 and the Leeds City Region Strategic Economic Plan.

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