



**FURTHER REPRESENTATIONS TO
KIRKLEES DRAFT LOCAL PLAN**

**LAND TO THE NORTH AND SOUTH
OF WAKEFIELD ROAD CLAYTON
WEST**

September 2016

Our Ref: Q50514



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EXECUTIVE SUMMARY

1. These Representations support the allocation of land to the north and south of Wakefield Road, Clayton West (“the CWDCL Land”) for employment use.
2. It has previously been demonstrated that the CWDCL Land is appropriate and sustainably located for employment purposes, and that it is deliverable, having the propensity to further the local economy.
3. The CWDCL Land was allocated in part in the draft Local Plan (November 2015) for employment purposes under draft Policy E2333. However, the proposed allocation covered a considerably smaller area than that promoted, extending to just 17.67ha as opposed to the 25.7ha promoted (i.e. 31% less).
4. Representations to the draft Local Plan showed that, as a consequence of the allocation being for a substantially smaller area than promoted, the Site would be unable to deliver the scale of commercial development envisaged by Kirklees Metropolitan Borough Council (“KC”) and which is necessary to meet the economic needs of Kirklees and the local area.
5. Those Representations went on to show that commercial development of the scale warranted to meet economic needs would be in-keeping with the existing built form within Scisset and Clayton West and that commercial development over the entire CWDCL Land would have no material impact upon the character or setting of any designated heritage assets.
6. Additionally, the representations demonstrated that KC’s suggested northern boundary to the allocation was arbitrary and failed to follow any defined features on the ground, and would not therefore provide a defensible, logical or long term limit to the Green Belt when redrawn.
7. With reference to the five purposes of the Green Belt, it was shown that it is entirely appropriate to redraw the Green Belt boundaries and release the CWDCL Land in full.

8. The representations then went on to show that there were no physical or environmental constraints that would prevent employment development coming forward on the CWDCL in the manner envisaged.
9. It was concluded that the CWDCL Land was a deliverable and viable development option which is entirely appropriate for allocation in full in the Local Plan.
10. KC has reviewed the CWDCL representations. KC's Landscape Architect ("LA") has also considered the potential landscape and visual impacts of allocating the CWDCL Land for employment development and provided advice to the Officers responsible for preparing the Local Plan.
11. Notably, the LA's response does not state that development at the CWDCL Land would have landscape or visual impacts that would be unacceptable when balanced with the need to deliver significant employment floorspace over the Plan Period. Nor does call in to question that the northern boundary of the CWDCL would be an appropriate new Green Belt Boundary when considered against the policy set out in the NPPF.
12. In advance of public consultation on the Publication Local Plan, KC has advised CWDCL that it is therefore considering an alternative northern boundary for allocation E2333. The proposed allocation ("the KC Site") now extends to just 16.87ha, which is 35% smaller than the site promoted (25.7ha).
13. Based on a development density of 2,300 sqm/ha, the KC Site would only deliver in the order of 38,800 sqm of commercial floorspace, some 16,200 sqm (almost 30%) less than the amount required to deliver KC's economic growth strategy.
14. Previous representations on the scale of the employment land requirement, market demand and the physical characteristics of the CWDCL Land (dated January 2015 and February 2016) remain entirely relevant.
15. This Report should be read alongside of those and their appendices, which together set out that:

- The CWDCL Land is under single ownership and its market attractiveness makes it a deliverable and viable development option;
 - There are no known complications that will prevent the early delivery of the Site;
 - A financial appraisal carried out for the Site demonstrates that the proposed development is viable;
 - The allocation area proposed by KC (17.67ha at the time, which has now been further reduced) is incapable of delivering the 55,000 sq m of employment floorspace required to meet market demand;
 - The CWDCL Land has the potential to deliver in the scale of development that is necessary and will deliver in order of 830 new jobs to Clayton West, meeting the demands of new residents whilst helping overcome the existing pattern of outmigration and deliver sustainable and mixed communities;
 - The allocation of the CWDCL Land meets the 5 purposes of the Green Belt and is environmentally appropriate for development.
16. The landscape and visual impacts of commercial development on the entire CWDCL Land have been considered further by CWDCL. These representations show how development of the CWDCL Land could be managed such that there would be no unacceptable landscape or visual impacts and that the CWDCL Land is, in landscape and visual terms, entirely appropriate for allocation in full in the Local Plan.
17. They also show that the alternative boundary of allocation E2333 now proposed by KC would not provide a defensible and logical limit to the Green Belt, contrary to Paragraph 85 of the NPPF. The amended Green Belt Boundary proposed by KC therefore remains unsound.
18. Furthermore, these representations additionally show that the KC Site would not be capable of accommodating the scale of development required to meet identified market demand in this locality and necessary to deliver KC's Spatial Strategy over the Plan Period.



19. These representations (together with those made previously in January 2015 and February 2016) demonstrate that the CWDCL Land is appropriate, suitable and capable of delivering in the amount of employment floorspace that is required to meet identified needs and anticipated marked demand within the Plan Period.

1 INTRODUCTION

a) Purpose of Representations

- 1.1 Clayton West Development Company Limited (“CWDCL”) have a development option on 25.7ha of land to the north and south of Wakefield Road, Clayton West. This is shown on the Plan at **Appendix 1**. This land is referred to throughout these representations as the “CWDCL Land”.
- 1.2 Representations were submitted on behalf of CWDCL in response to the Kirklees Metropolitan Borough Council (here after referred to as “KC”) Call for Site’s exercise in January 2015, in which it was demonstrated that the CWDCL Land was appropriate and sustainably located for employment purposes.
- 1.3 The CWDCL Land was allocated (in part) in the draft Local Plan (November 2015) for employment purposes under draft Policy E2333, however the proposed allocation covered a considerably smaller area than that promoted by CWDCL, extending to just 17.67ha (gross).
- 1.4 In February 2016, CWDCL made representations on the draft Local Plan. Those representations showed that, as a consequence of the allocation being for a substantially smaller area than that promoted, the Site would be unable to deliver the scale of development envisaged by KC and necessary to meet the economic needs of Kirklees and the local area.
- 1.5 Those representations went on to show that development of the CWDCL would be entirely appropriate in the context of the existing built form within Scisset and Clayton West and would have no material impact upon the character or setting of any designated heritage assets.
- 1.6 They also showed that KC’s suggested northern boundary to the allocation would not provide a defensible and logical limit to the Green Belt. With reference to the five purposes of the Green Belt, it was shown that it is entirely appropriate to redraw the Green Belt boundaries and release the CWDCL Land in the manner shown in **Appendix 2**.
- 1.7 On this basis, the representations concluded that the full extent of the CWDCL Land is entirely appropriate for development in landscape, visual and heritage terms. Furthermore, it was shown that

there were no physical or environmental constraints that would prevent employment development coming forward on the CWDCL in the manner envisaged.

- 1.8 The representations concluded that the CWDCL Land was a deliverable and viable development option.
- 1.9 KC has reviewed the representations. KC's Landscape Architect ("LA") has also considered the potential landscape and visual impacts of allocating the CWDCL Land for employment development in detail. The LA has provided advice to the Officers preparing the Local Plan on these matters.
- 1.10 KC has advised CWDCL that it has accepted that the northern boundary of E2333 (as proposed in the draft Local Plan dated November 2015) would not provide a defensible and logical limit to the Green Belt but that, on the basis of the advice from its LA, they are not proposing to allocate all of the CWDCL Land. KC is considering the alternative northern boundary for allocation E2333 shown on the plan in **Appendix 3**.
- 1.11 KC have given CWDCL the opportunity to consider the advice of their LA and the extent of allocation E2333 as now proposed ("the KC Site"), and submit further information.
- 1.12 Previous representations on the scale of the employment land requirement, market demand and the physical characteristics of the CWDCL Land (dated January 2015 and February 2016) remain entirely relevant and, for the sake of brevity, are not repeated in full in these representations but are summarised below. This report should be read alongside of those (and their Appendices).

b) Policy and Evidence Base Summary

- 1.13 To meet the needs of indigenous businesses and to attract inward investment, KC has set an ambitious employment growth agenda within their draft Local Plan.
- 1.14 Through the draft Local Plan, KC identified what they consider to be a deliverable supply of sustainable and environmentally appropriate sites for allocation to meet this objective. This necessitated a review of Green Belt boundaries.
- 1.15 The spatial distribution of proposed allocations has been governed by market demand, the Borough's socio-demographic and physical characteristics. The objective is for sites to be easily accessible to

existing and future working populations and capable of being developed without inappropriate impacts upon the local environment.

- 1.16 The CWCDL Land was proposed to be allocated in part for employment uses under Policy E2333 of the draft Local Plan. A requirement for the allocation to accommodate in the order of 55,000 sqm of new employment floorspace was identified by KC through their evidence base.
- 1.17 CWDC's previous representations (February 2016) showed that proposed allocation E2333 (which extended to just 17.6 ha of the 25.6 ha promoted by CWDC) would not be capable of delivering this amount of new employment floorspace.

c) Market Demand

- 1.18 CWDC's previous representations were supported by a Market Assessment prepared by commercial agents and property advisors JLL.
- 1.19 The Assessment considered the previous and current market trends, as well as future need for new flexible employment floorspace. It also considered the relative attractiveness of South Kirklees and Clayton West in particular (which dominates the employment market in this area) for existing and new employment occupiers to show the scale of floorspace proposed (55,196 sqm) by draft policy E2333 was appropriate in market terms (and therefore deliverable and viable).
- 1.20 The Assessment shows that if the current rate of take up in the local area (as defined by JLL) continues existing stock will be taken up in less than two years (circa 18 months from the date of these further representations).
- 1.21 It was also shown that due to a lack of sites of sufficient scale, occupiers with building requirements of greater than 2,322 sqm are forced to look elsewhere (within the Borough or outside of it).
- 1.22 Clayton West is identified by JLL as the optimum location within South Kirklees for employment development due its proximity to the M1 motorway (just over 6km) and along the Wakefield Road Corridor.

- 1.23 A lack of available commercial space and deliverable sites within Clayton West and the wider South Kirklees Area to accommodate occupier requirements has led to significant latent demand for employment space, which is in the order of 23,255 sqm (250,000 sqft).
- 1.24 If this scale of existing demand was accommodated at the CWDCL Land, it would create a critical mass which could result in an employment land delivery rate of 2,322 sqm per annum, enabling the delivery of 27,870 sqm to 37,160 sqm over the Plan Period. Added to existing demand, this would warrant an allocation capable of delivering in the order of 52,000 sqm to 62,000 sqm employment.
- 1.25 If this scale of existing demand is not accommodated at the CWDCL Lane, the market would be severely constrained and KC would be unable to deliver its economic growth agenda.

d) Structure of Representations

- 1.26 The rest of these representations are structured as follows:
- Section 2 explains how the LA's comments have been considered in the further work undertaken by Smeedan Foreman (which is attached in full at **Appendix 4**). This further work shows that development of the CWDCL Land could be managed such that there would be no unacceptable landscape or visual impacts;
 - Section 3 sets out CWDCL's representations on the suggested KC Site. It demonstrates the KC Site would not provide a defensible and logical limit to the Green Belt and would not be capable of accommodating the scale of development required to meet identified market demand in this locality and necessary to deliver KC's spatial growth strategy over the Plan Period. It concludes that the CWDCL Land is appropriate and suitable for allocation in its entirety.

2 APPROPRIATENESS OF CWDCL LAND

a) Previous Representations

- 2.1 CWDCL's previous representations (February 2016) demonstrated that, whilst proposed allocation E2333 was appropriately located to meet identified needs for new employment floorspace, it is of insufficient scale to meet the level of need identified by KC or market demand and it is necessary to extend it.
- 2.2 They also showed that it is inappropriate to redraw the Green Belt boundary along the northern boundary of E2333 in the way suggested by KC. An alternative defensible limit to the development that follows logical features on the ground is more appropriate.
- 2.3 In support of the allocation of the CWDCL Land in full, a landscape character and visual appraisal of the CWDCL Land and its surrounds was undertaken by Smeedan Foreman. It assessed the impacts of development on the visual amenity and landscape character of the area, and set out recommendations on how existing and additional landscaping could be used to mitigate any impacts (if necessary).
- 2.4 The representations concluded that the CWDCL Land is appropriate in environmental terms, viable and therefore deliverable.
- 2.5 KC has reviewed these representations and the evidence which supported them, including the work undertaken by Smeedan Foreman. As part of this process, the views of KC's Landscape Architect ("LA") have been sought.
- 2.6 In doing so, KC has recognised that the northern boundary of E2333 proposed in the draft Local Plan did not represent a defensible Green Belt boundary and that it should be redrawn.
- 2.7 The LA has, however, expressed concerns about the landscape and visual impacts associated with development beyond the northern boundary of E2333.
- 2.8 KC is suggesting a new northern boundary for allocation E2333 (hereafter "the KC Site"). The extent of the KC Site is shown on the plan at **Appendix 3**. The position of the proposed boundary is such that

it further reduces the area of the KC Site to 16.87 ha (representing a further reduction of 0.8 ha and being 9.83 ha less than the extent of the site proposed by CWDCL). The effect of this is that the KC Site would only deliver in the order of 38,800 sqm of commercial floorspace, some 16,200 sqm (almost 30%) less than the amount required to deliver KC's economic growth strategy.

b) Landscape and Visual Impacts

- 2.9 CWDCL accepts that the landscape and visual impacts of developing the CWDCL Land for employment uses requires careful consideration due to its scale, greenfield character and location within a predominantly rural area.
- 2.10 The implications of releasing the site from the Green Belt, and thus the need to find an appropriate boundary along which to redraw the Green Belt Boundary, is related to this (albeit it requires consideration in its own right).
- 2.11 Smeedan Foreman have undertaken further work (set out in the Landscape Statement included at **Appendix 4**) to respond to these comments as follows:
- Further review of the existing pattern of development in Clayton West/Scissett, the height of existing buildings at Gilcar Farm and the CWDCL Land's levels to enable assessment of the potential landscape and visual impacts of development on the CWDCL Land in this context;
 - More detailed consideration of the way that development could take place on the CWDCL Land, including potential development plateau levels, buildings heights and opportunities for landscape mitigation measures to be provided on site;
 - Further consideration of the potential landscape and visual impacts of the proposed development on key receptors and from a range of representative viewpoints (including experience of the Public Rights of Way at the Site).
- 2.12 The conclusions that Smeedan Foreman set out in the Landscape Statement are summarised in the paragraphs that follow.

i) Development Context

- 2.13 The settlements of Clayton West, Scissett and others to their west extend further up the valley sides than the CWDCL Land.
- 2.14 To the north of the CWDCL Lane, the farmstead at Gilcar Farm includes a range of buildings. These buildings would provide the context for views of commercial development on the CWDCL Land. The ridge heights of these buildings are up to 118.59m (AOD).

ii) Approach to Development

- 2.15 The CWDCL Land could be developed to respond to topographical constraints and could incorporate landscape elements which will accord with the wider landscape character.
- 2.16 The creation of development plateaus within the CWDCL Land will provide opportunities to incorporate banks of landscape which further reduce the visibility of the northern most part of the CWDCL Land.
- 2.17 Development plateaus could be created across the CWDCL Land such that buildings with ridge heights of up to 8.5m (which is the likely maximum height of buildings of the type and scale to be delivered to meet the economic need identified by KC) could be accommodated and they would sit below the height of buildings at Gilcar Farm.
- 2.18 There are opportunities for integrating the development into the receiving landscape when seen from the surrounding area.
- 2.19 If commercial development was constrained to the KC Site, there would provide far less opportunities to incorporate landscape mitigation than if the CWDCL Land was developed in full. The residual impact of the full CWDCL Land is anticipated as being minor beneficial in relation to the KC Site baseline.

iii) Visual Amenity

- 2.20 Whilst the CWDCL Land covers a larger area than the KC Site and its most elevated point lies above that of the KC Site, visibility is limited. The CWDCL Land represents a very minimal visual extension

beyond the KC Site from the majority of viewpoints that were assessed, including Kirklees Way (which KC identified as being a key viewpoint).

- 2.21 There are very few locations where receptors would determine a discernible change in the extent of development that would be visible were the CWDCL Land beyond the boundary of the KC Site to be developed.
- 2.22 From the Public Right of Way (PROW DEN 14/10) within the KC Site, the most elevated part of the CWDCL site is obscured by intervening hedgerow. Views of the CWDCL Land from Kiln Lane are similarly obscured by mature hedgerow.
- 2.23 An additional 180m of PROW DEN 14/10 footpath would pass through the commercial development if the full CWDCL Land was allocated. The truncation of the path at the point where it connects with Gillcar Farm Lane (also a Public Right of Way) would however be a logical point at which walkers could transition between the rural landscape to the north and the commercial development. Extending the commercial development site to incorporate the CWDCL Land in full would afford a more gradual transition to these users. This would not be achievable within the constrained KC Site.
- 2.24 Commercial development of the CWDCL Land in full would therefore not be detrimental to the user's experience of any routes or of their experience of the landscape from key viewpoints.
- 2.25 In the context of the KC Site baseline, the magnitude of the impact of the commercial development on the full CWDCL Land would be neutral to negligible. The residual impact of the full CWDCL Land is anticipated as being minor beneficial in relation to the KC Site baseline.

iv) Conclusions

- 2.26 The perception of the part of the CWDCL Land which lies beyond the northern boundary of the KC Site is far less in reality than when in plan due to physical elements within the landscape. These physical elements provide screening, minimising the nature and extent of the visibility of the CWDCL Land from the surrounding area.
- 2.27 Commercial development could take place on the whole of the CWDCL Land in such a way that the magnitude of change would be low or negligible. In some cases, development of the CWDCL Land in full rather than limiting development to the KC Site would result in minor beneficial impacts.

2.28 The allocation of the CWDCL Land in full would therefore not result in any unacceptable landscape or visual impacts whatsoever and, furthermore, it would not detrimentally effect the experience of users of the Public Rights of Way or other routes/receptor locations at or near the Site.

c) Proposed Green Belt Boundary

2.29 Smeedan Foreman have also assessed the revised northern boundary of the KC Site against the relevant Green Belt tests that are set out at Paragraph 85 of the NPPF.

2.30 Paragraph 83 of the NPPF is clear that, in considering Green Belt Boundaries, local planning authorities must have *“regard to their intended permanence in the long term, so that they should be capable of enduring beyond the Plan Period”*.

2.31 Smeedan Foreman have assessed the revised northern boundary of the KC Site against the relevant Green Belt tests that are set out at Paragraph 85 of the NPPF.

2.32 It remains the case that the Green Belt Boundary by KC would fail to create a strong, readily recognisable and defensible Green Belt Boundary.

2.33 75m (30%) of the northern boundary of the KC Site has no existing feature on the ground and where features do exist they are not strong or defensible, being limited to hedgerow. The northern boundary of the CWDCL Land is marked by more easily read features, including the Public Right of Way, tarmac drive and overhead power lines.

2.34 Hedgerow trees along the northern boundary of the KC Site would necessitate an offset of 8.5m before any level changes occur within the site. This would significantly reduce the developable area of the KC Site, notwithstanding the supplementary landscape that would be necessary to reinforce this insubstantial boundary when balanced with those of the CWDCL site.

2.35 Based on an achievable development density of 3,200 sqm/ha, the KC Site would only deliver in the order of 38,800 sqm of commercial floorspace, which is 16,200 sqm (almost 30%) less than the amount required to deliver KC’s economic growth strategy.

2.36 Because the KC Site would not be capable of accommodating the amount of employment development that is necessary to meet identified needs or market demand, the proposed Green Belt

Boundary is not consistent with the Local Plan strategy for meeting identified requirements for sustainable development (as required by Paragraph 85).

2.37 Contrary to the NPPF, it is also not possible to conclude that it will not need to be altered again at the end of the Plan Period, or indeed that there would not be pressure to consider development proposals within the Green Belt during the Plan Period.

2.38 As such, the Green Belt Boundary proposed by KC is inappropriate and unsound.

d) Summary

2.39 The CWDCL Land has been demonstrated to be appropriate, sustainable and deliverable for allocation within the Local Plan. The CWDCL Land promotes the achievement of sustainable economic development when assessed against the Council's sustainability criteria.

2.40 The CWDCL Land will provide a significant amount of new employment floorspace that is capable of providing a range of high quality job opportunities locally. It will address the current and significant levels of out-migration of employment opportunities from Clayton West and South Kirklees, which is constraining the economic growth of the area. In doing so, it will deliver sustainable rural communities in accordance with the Spatial Strategy of the draft Local Plan.

2.41 Because of its limited extent, which is some 9.83 ha (35%) less than that proposed by CWDCL, the KC Site would fail to deliver the amount of commercial floorspace that is necessary (in the order of the 38,800 sqm, which is 30% less than the amount required) to deliver KC's economic growth strategy.

2.42 As a consequence of this, the KC Site will not fully address issues of out-migration to access job opportunities and longer distance commuting, and will fail to properly deliver the economic objectives of KC's Spatial Strategy.

2.43 The limited nature of the KC Site also reduces the potential for landscape mitigation measures to be incorporated into development design, to the potential detriment of the visual amenity of the area.

2.44 Whilst KC have sought to address concerns that the previously proposed northern boundary of allocation E2333 would not deliver a defensible and long standing boundary to the north of the site,



the alternative boundary that KC has now proposed does not fully address these matters. The proposed Green Belt Boundary of the KC Site remains unsound.

- 2.45 The northern boundary of the CWDCL follows specific features on the ground that are capable of delivering a strong, defensible boundary. There potential to bolster this furtherstill through the provision of additional landscaping, which will also have landscape and ecological benefits.
- 2.46 The proposed CWDCL Land would, if allocated, deliver the scale of floorspace for which there is market demand, and it is deliverable and viable.
- 2.47 Together with previous representations, it has been shown that there are no environmental constraints to development which cannot be appropriately and effectively overcome through the incorporation of mitigation or through site design at the relevant stage, parameters for which can be identified in the supporting text to Policy E2333 in the Local Plan.

3 SUMMARY REPRESENTATIONS

- 3.1 KC has accepted that the northern boundary of E2333 proposed in the draft Local Plan would not have provided a defensible and logical limit to the Green Belt (when redrawn around their proposed allocation area).
- 3.2 KC has, however, indicated that (on the basis of the advice from its LA) they are not proposing to allocate all of the CWDCL Land for employment use. KC have given CWDCL the opportunity to consider the advice of their LA and the extent of the KC Site, and these representation are made in response to that invitation.
- 3.3 These representations reinforce that KC's proposal to allocate land to the east of Clayton West is entirely appropriate and necessary to help meet identified market demand for flexible employment floorspace in this locality and deliver KC's Spatial Growth Strategy.
- 3.4 Despite this, the revised allocation boundary proposed by KC is demonstrated to be ineffective in accommodating the scale of development that is deemed appropriate for the Site and, fundamentally, is essential to deliver the Local Plan's economic strategy, whilst providing a defensible and logical limit to the Green Belt (when redrawn).
- 3.5 The KC Site would only deliver in the order of 38,800 sqm of commercial floorspace, some 16,200 sqm (almost 30%) less than the amount required to deliver KC's economic growth strategy.
- 3.6 These representations have concluded that the CWDCL Land provides a more appropriate and logical allocation boundary that meets the above objectives. They have also shown that employment development across the full extent of the CWDCL Land would not cause unacceptable landscape or visual change.
- 3.7 Furthermore, these representations show that development of the CWDCL Land could incorporate landscape mitigation measures (if necessary) that could not be readily accommodated within the KC Site without further challenging its ability to deliver the level of employment development that is necessary to deliver the Local Plan's strategic aim of economic growth in South Kirklees.

- 3.8 The draft Local Plan (and its evidence base) shows that there are no suitable alternative sites to the CWDCL Land within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver KC's Spatial Growth Strategy or its economic growth objectives, or indeed the 16,200 sqm of unmet commercial floorspace need that would remain if the KC Site was allocated rather than the full CWDCL Land.
- 3.9 In summary, together with previous representations, it has been shown that there is a need to allocate an area of 25.7 ha in this location to deliver an environmentally appropriate and viable development proposition to meet the identified economic needs of the area.
- 3.10 Like previous representations made by CWDCL, these representations have concluded that the CWDCL Land will:
- Provide a deliverable development option that realises the market and industry requirements of the local area and wider Functional Economic Area and is a realistic, attractive and viable development proposition;
 - Will provide significant employment opportunities locally to help overcome current patterns of outmigration in order to support population growth locally and deliver sustainable and prosperous communities;
 - Not undermine the purpose of the Kirklees Green Belt in this location;
 - Reflect local landscape characteristics and is capable of being designed to respond well to local landscape patterns;
 - Provide appropriate space within the allocation area for new areas of woodland planting to assimilate development within its surroundings;
 - Not harm the character or setting of local heritage assets through the provision of carefully designed and meaningful landscape treatment;
 - Be appropriately and safely accessed via Wakefield Road;



- Be appropriately accommodated without an unacceptable impact upon ecology, and through the provision of meaningful new landscaping, has the potential to deliver significant biodiversity improvements; and
- Be appropriately served by necessary utility provision and can be effectively designed to overcome localised topographic constraints.

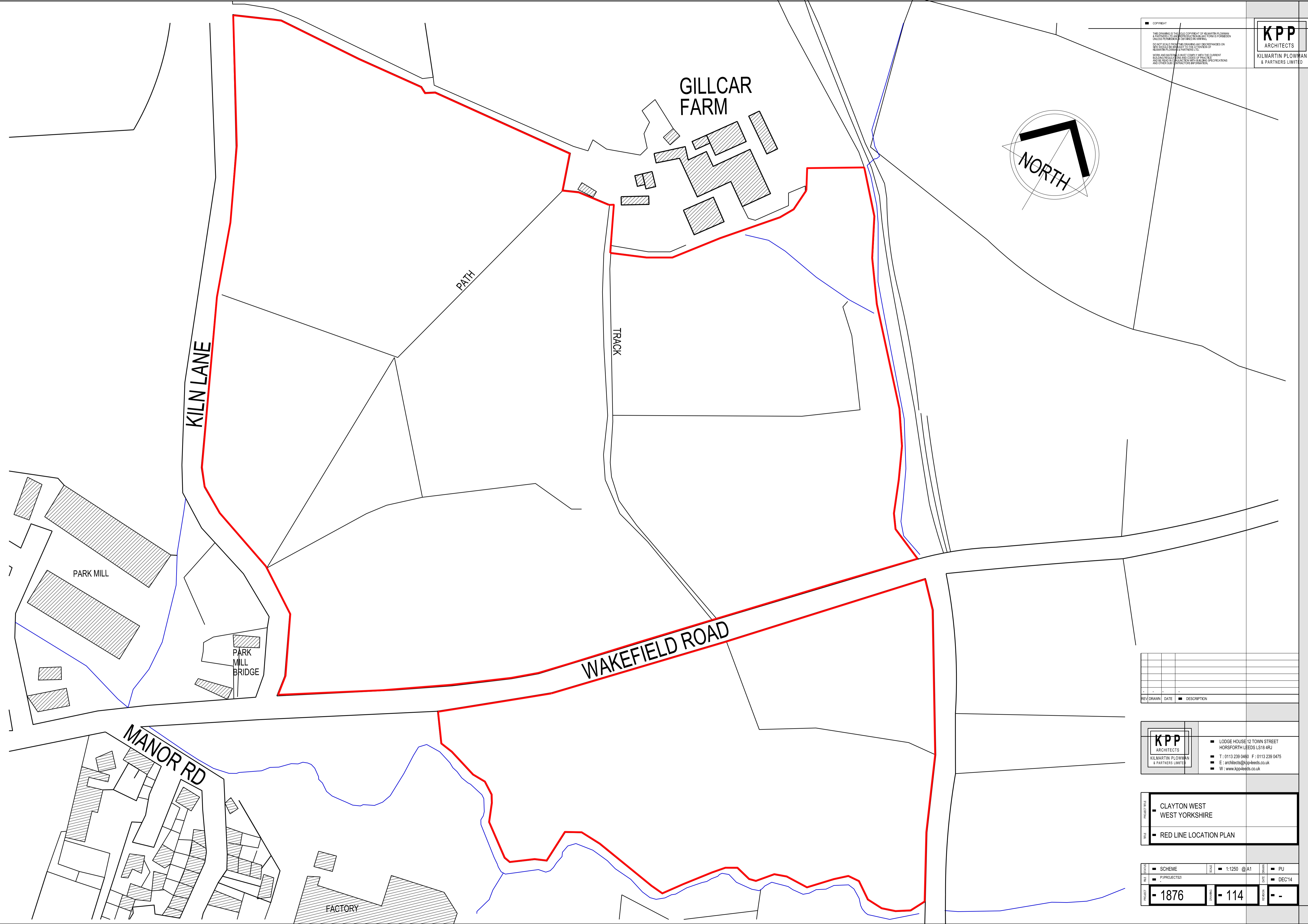
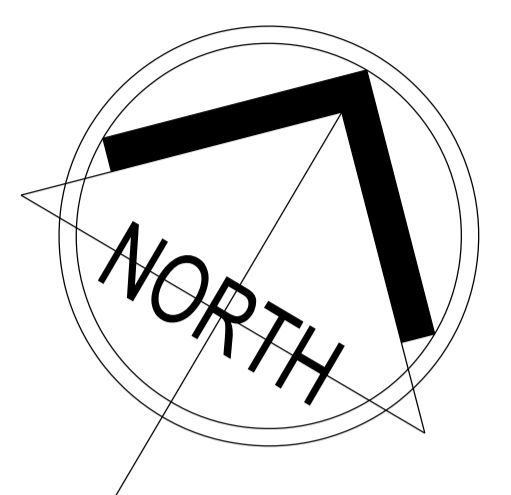
3.11 In these circumstances the CWDCL Land merits allocation in full.



APPENDIX 1

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PROJECT TITLE
 ■ CLAYTON WEST
WEST YORKSHIRE

TITLE
 ■ RED LINE LOCATION PLAN

FILE STATUS	■ SCHEME	SCALE	■ 1:1250 @A1	DATE	■ PU
PROJECT	■ P/PROJECTS/	NUMBER	■ 114	YEAR	■ DEC'14
	■ 1876				



APPENDIX 2

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AREA - 25.7 HECTARES GROSS

REV	DRAWN	DATE	DESCRIPTION



LODGE HOUSE 12 TOWN STREET
HORSFORTH LEEDS LS18 4RJ
T: 0113 239 0460 F: 0113 239 0475
E: architects@kpp-leeds.co.uk
W: www.kpp-leeds.co.uk

PROJECT TITLE
CLAYTON WEST
WEST YORKSHIRE

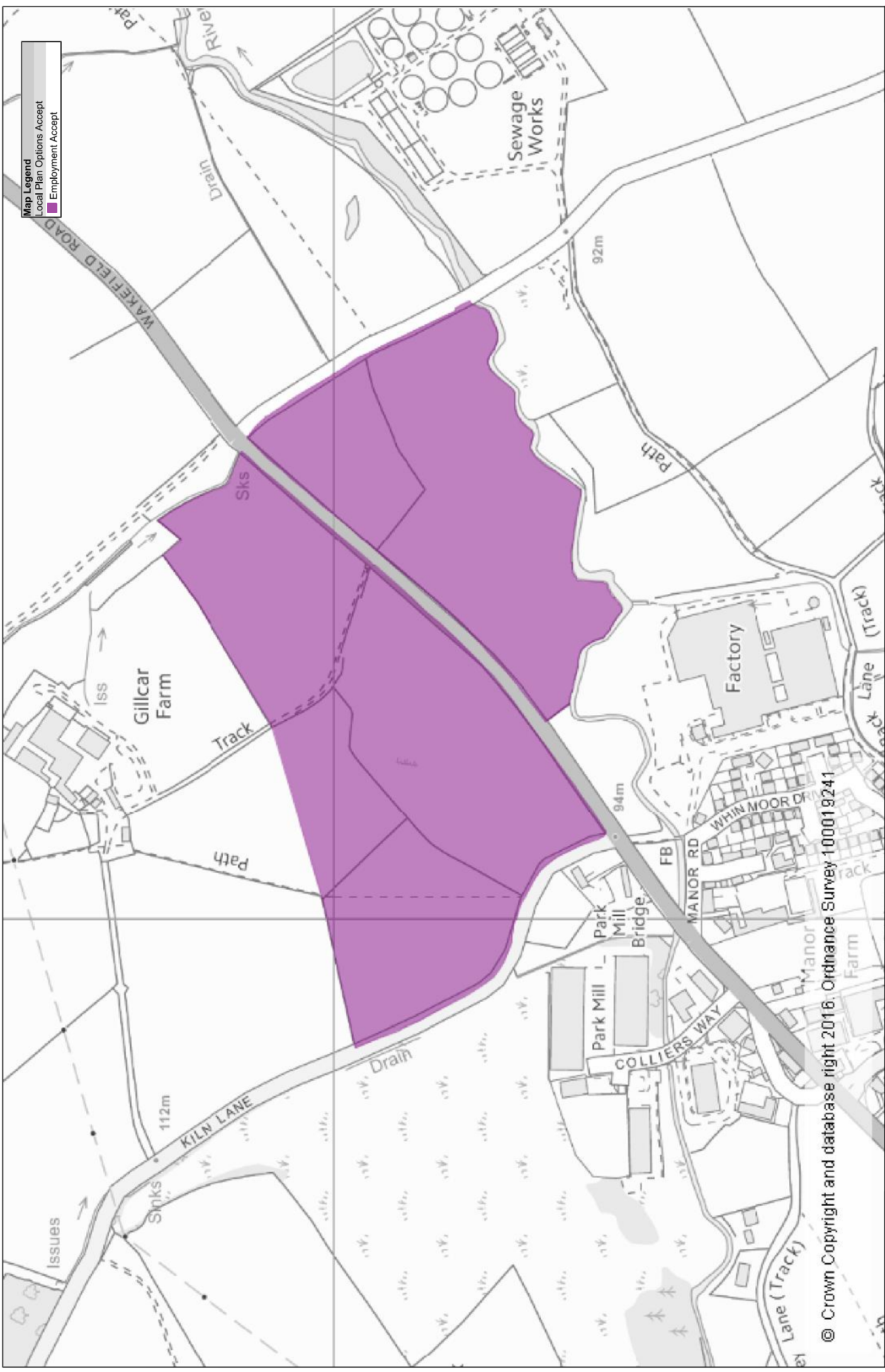
TITLE
SITE MASTER PLAN

SCHEME	SCALE	1:1250 @ A1	PU
PROJECTOR	DATE	JAN'15	
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APPENDIX 3

Map Legend
 Local Plan Options Accept
 Employment Accept

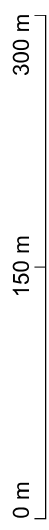


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26-Aug-2016

Scale 1 : 3296



Kirklees
 council

Kompass
 Kilklees Mapping Service



APPENDIX 4

Appendix C

Responses to report from Kirklees' Landscape Architect

1.0 Introduction

In undertaking consultation on the Draft Allocations for inclusion within the emerging Local Plan, Kirklees Metropolitan Borough Council has provided Clayton West Development Company Limited (CWDCL) with the report prepared by their Landscape Officer.

The inclusion of the KMBC site (E2333) as future employment land within the Draft Local Plan indicates that landscape and visual impacts arising from the development of this site are considered acceptable, however further to representations made by CWDCL, KMBC accept the boundary of the site would not have been in accord with requirements for a new defensible Green Belt edge. KMBC have since adjusted the northern boundary of the site following advice from their Landscape Officer. The further work we have undertaken in July 2016, considers their revised site extent to be a baseline, upon which the additional land contained within the CWDCL site is further appraised.

This document provides additional evidence to support the findings of earlier appraisals that the utilisation of the wider site, as proposed by the CWDCL, can be developed with acceptable changes to landscape and visual amenity and to demonstrate that its allocation offers a more viable, robust and sustainable solution when considering Green Belt purposes alongside the provision with the Local Plan for sites that can deliver future employment use.

1.2 Site viability and design

In order to develop the land, both that within the revised KMBC site and the CWDCL site, constraints posed by the sloping nature of the land located north of Wakefield Road require engineering solutions to achieve deliverable developable space. In preparing information in support of the CWDCL site, a strategic masterplan has been developed. This has taken into consideration advice to mitigate for landscape and visual effects, integrate development into the surrounding landscape and reinforce a strong, new Green Belt boundary.

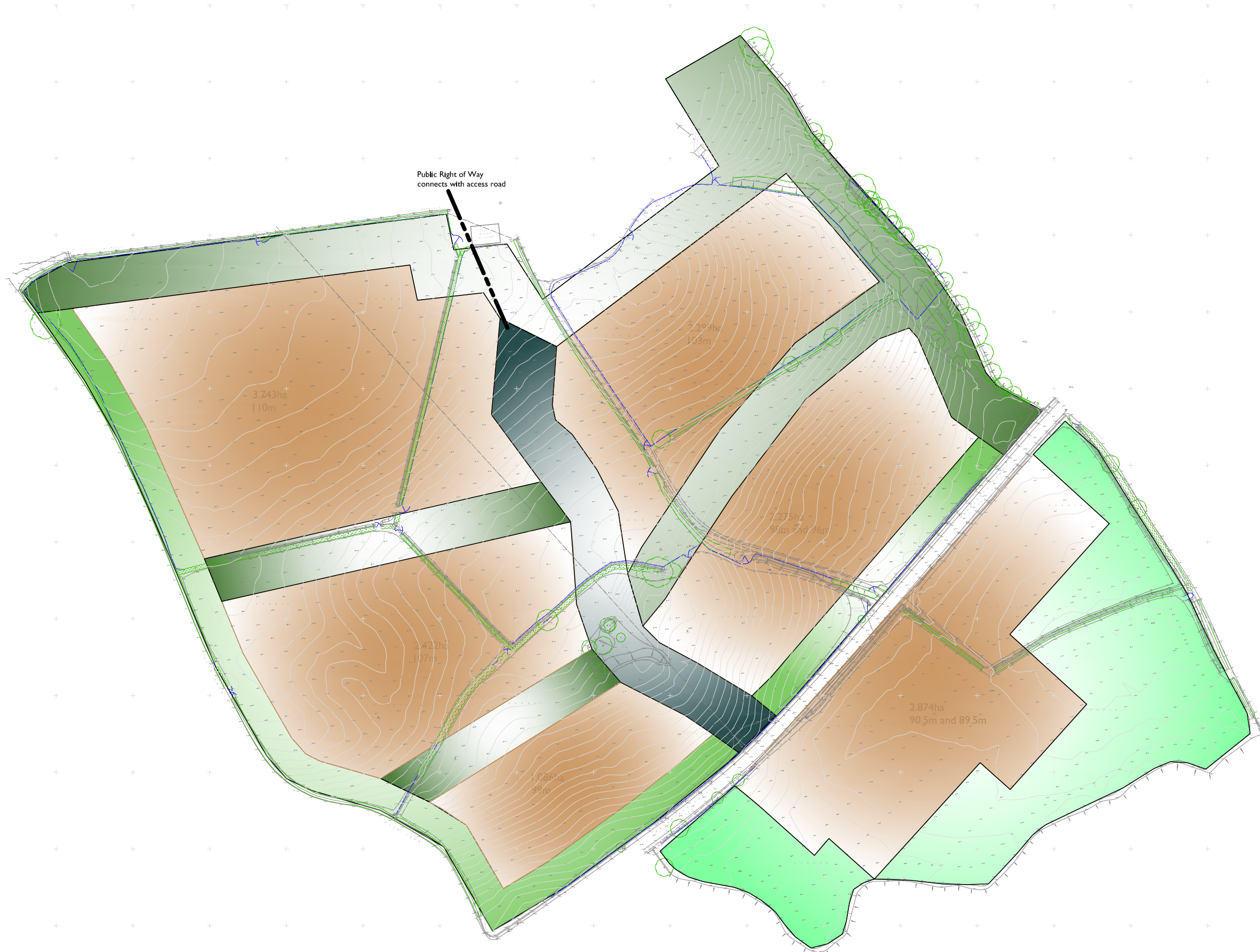
In reviewing the concerns raised by the Landscape Officer, further detail has been considered in relation to the form and configuration of development of the CWDCL site. In conjunction with this, we have prepared the following information which supports the CWDCL site as more appropriate for allocation. This has enabled the design team to test design parameters for the site within which it is considered that development will have nominal or no residual landscape or visual impacts beyond those which are considered acceptable for the KMBC site. These are summarised as follows:

- The drawing at Figure 1 has been prepared to provide strategic landscape areas within the site and to site boundaries. These vary between 20m along Kiln Lane and 30m between each development plateaus and a minimum of 30m adjacent to Gillcar Farm and the farm lane where a wider landscape belt can be incorporated to form the redefined Green Belt edge.
- We identify indicative plateau levels and building heights which respond to the existing topography and the relationship with Gillcar Farm.

1.3 Application of methodology

As set out within the previously undertaken landscape study, this document does not comprise a formal Landscape and Visual Impact Appraisal (LVIA) and site survey and base line work has been undertaken with a view that further assessment would be undertaken in relation to future planning applications.

For each of the following instances where the Landscape Officer raises concerns, we provide a summary conclusion within which we outline the anticipated magnitude of change which could result when considering the impact of the additional land included within the CWDCL site, considering the KMBC allocation site as a baseline.



Public Right of Way connects with access road

- KEY**
- Development Area
 - Landscape Buffer Zone - 30m Woodland planting
 - Landscape Buffer Zone - 20m Woodland planting
 - Access road - Woodland scale tree planting
 - Landscape Buffer Zone - river corridor flood zone
- Gradients to landscape areas to be no greater than 1 in 3.

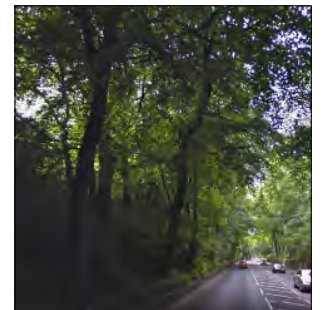
Precedent Images



Owlter Wood to the north of the site along Kiln Road



Forest scale trees growing on embankment in Huddersfield



Rev	Date	Drawn	Checked

SMEEDEN FOREMAN

Project: Land off Wakefield Road, Clayton West
 Title: Developable Area Plan
 Scale: 1:1250 Drawn by: FH
 at: AI
 Date: 03.08.16 Checked: MS
 Project No.: SF 2356 Drawing No.: DA01 Rev:
 Landscape Architects - Urban Designers
 Ecologists - Horticulturists
 Somerset House, Low Moor Lane, Scotton, Knaresborough, N. Yorks HG5 9JB
 Tel: 01423 863369 Fax: 01423 313107
 Email: office@smeedenforeman.co.uk
 www.smeedenforeman.co.uk



Figure 1 Indicative development strategy plan

The drawing is the property of the Landscape Architects. Copyright reserved.

The Landscape Officer has concerns relating to the increased visibility of development which would occur within the northern part of the site and states that "future development for employment would be more in keeping therefore, if it is contained within the lower valley areas and adjacent to the river rather than extending to the upper valley sides and intruding further into the green belt."

The settlements of Clayton West, Scissett and settlements to the west extend further up the valley sides than the proposed development site. Within Clayton West, urban areas extend up to approximately 150mAOD to the southern valley side. On the northern valley side, to the west of the site, development extends to 135m near Scissett, and which will be extended by future housing allocation (Ref H222 in the Draft Local Plan).

The difference in elevation between the most elevated location of the site put forward by KMDC and that of the CWDCL site is 4.51m. Figure 2 shows a series of cross sections which put the location of the respective sites into the wider valley context. We acknowledge that the CWDCL site is larger and incorporates land that is slightly more elevated than the KMBC proposed site. However, as illustrated within the cross sections, the extent to which the CWDCL proposal presents such a perception of further 'intrusion' into the Green Belt should be considered on balance to the anticipated increased impacts upon landscape, visual amenity and fundamentally, how each site responds to the Green Belt purposes along side the ability of the site to deliver sustainable, appropriate future development.

Three images provided within the Landscape Officers' report show the view from the Kirklees Way to the southern valley side and highlight i) the existing view ii) the original allocation as proposed in the Draft Local Plan and; iii) the proposed CWDCL development area. We consider that three images show the minimal additional site area which is visible from that location on the Kirklees Way. To further demonstrate this, we include lines of sight for receptors at viewpoint 2 and viewpoint 14 (as located on Figure 4), from the south and the north of the site respectively. These illustrate the way the sites could be developed to respond to the topographical constraints and incorporate landscape elements which will accord with wider landscape character and provide opportunities for integration of the development into the receiving landscape when seen from the surrounding area.

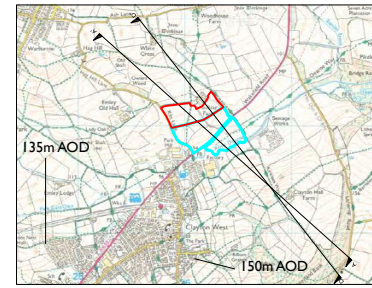
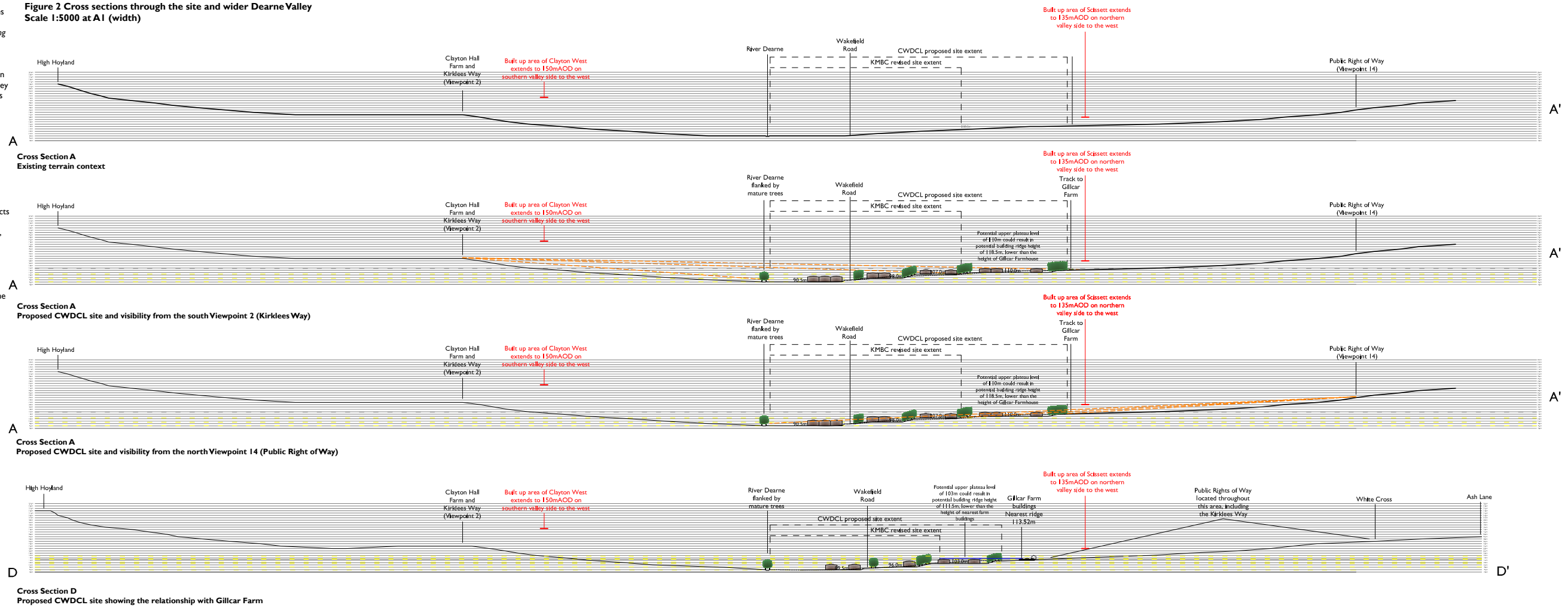


Figure 3 Cross section locations

Figure 2 Cross sections through the site and wider Dearn Valley Scale 1:5000 at A1 (width)



2.0 Impacts on Visual Amenity

The perception of the increased site area, as proposed by the CWDCL site may be less in reality than when viewed in plan due to physical elements within the landscape which assist screening and the nature and extent of visibility afforded towards the site from the surrounding areas. Our previously undertaken visual appraisal provides a series of representative views from a variety of receptors located within the study area and concluded that for the CWDCL site:

- There is good screening from the west and development would not be seen as out of context in consideration of the existing urban land uses along Wakefield Road within Clayton West and Scissett.
- Within the principal residential areas of Clayton West, visibility of the site is limited.
- Where rights of way pass in close proximity to the site there will be a definitive change to the views however it would be seen as reflective of the context of the nearby large scale factory and the wider settlement of Clayton West.
- From receptors further south more open views across the valley are afforded, within which the part of the site which lies to the north of Wakefield Road is visible as it rises up the valley side, and which would be visible were either site developed. In allocating this part of the site it is anticipated that KMBC accept the visibility of this part of the CWDCL site.
- Residential receptors with visibility of the site are few and comprise farm houses at Clayton Hall Farm, residential property on Litherop Road (Viewpoint 3), White Cross and Yew Tree Farm to the north and Gillcar Farm adjacent to the site and there is potential for the development of the site to result in a notable change within their views.

In response to the concerns raised about the visibility of northern part of the site put forward by the CWDCL, we have reviewed the potential change to views at previously visited locations (excepting locations where we anticipate no change to views from the development of either site extent) and consider the change which could result from the development of the revised KMBC site in relation to that anticipated for the proposed CWDCL site. In considering the potential change, we have prepared a series of images upon which we illustrate the existing view and visibility of the KMBC and CWDCL sites respectively.

The series of images illustrate that:

- Based upon visibility of the bare ground (as shown within the photographs), there are very few locations where receptors would determine a discernible change in the extent of development that would be visible were the CWDCL to be developed.
- The nominal change is further demonstrated by referring to the cross sections at Figure I, which provide an indicative proposal for how the CWDCL site could be developed to accommodate the sloping topography of the land to the north of Wakefield Road. Plateaus within the site provide an opportunity for the incorporation of banks of landscape which further negate visibility of the northern most part of the CWDCL site.
- The panorama at Figure 5 was taken from the Public Right of Way within the current KMBC site allocation, marked on Figure 4 with a star. This demonstrates the nominal difference in elevation between the KMBC and CWDCL sites whereby the most elevated part of the CWDCL site is obscured by the intervening hedgerow.



Figure 5 View north east from Public Right of Way within the most westerly field of the revised KMBC allocation site

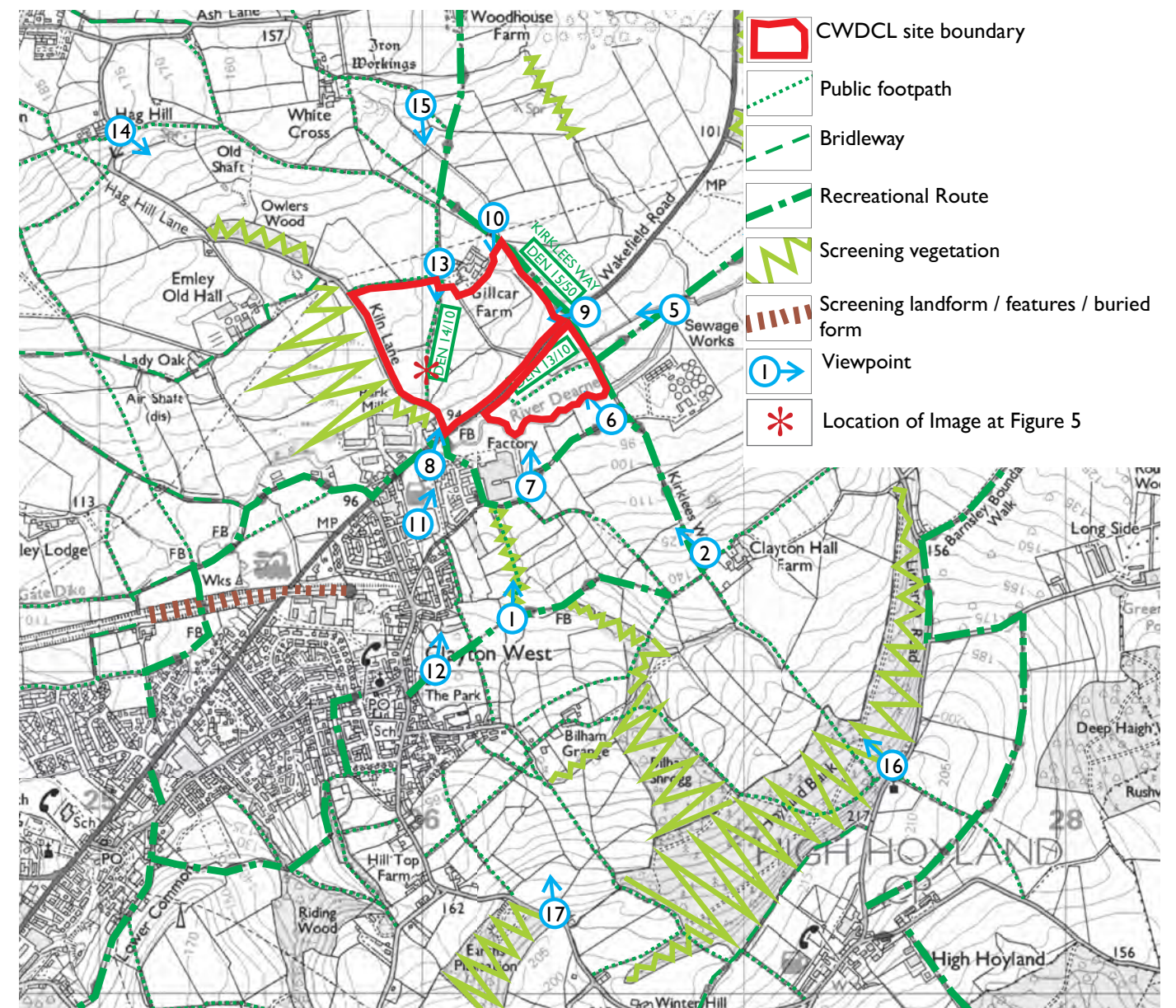


Figure 4 Viewpoint location plan with proposed CWDCL site extent outlined in red

Summary of change

Based upon the indicative parameters explored within this appraisal, the anticipated magnitude of change to visual amenity which could arise from the development of the northern part of the CWDCL site when considering the KMBC allocation site as a baseline, is considered to be **low to negligible**. When considering the increased potential to incorporate appropriate landscape belts within the CWDCL site, the residual impact could be anticipated as being **minor beneficial** in relation to the KMBC site.

Viewpoint Location I -View north from the Kirklees Way.



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDC Proposed Allocation (shaded pink)

Viewpoint Location 2 - Kirklees Way and residence at Clayton Hall Farm



Proposed allocation site(s) within the wider context of views from this viewpoint location

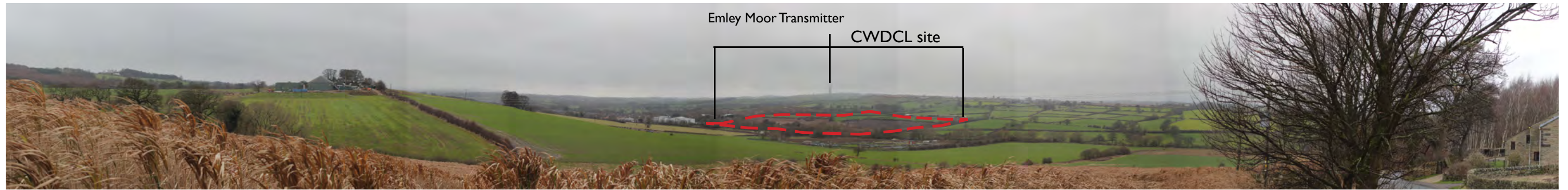


Visibility of KMBC Revised Allocation (shaded yellow)

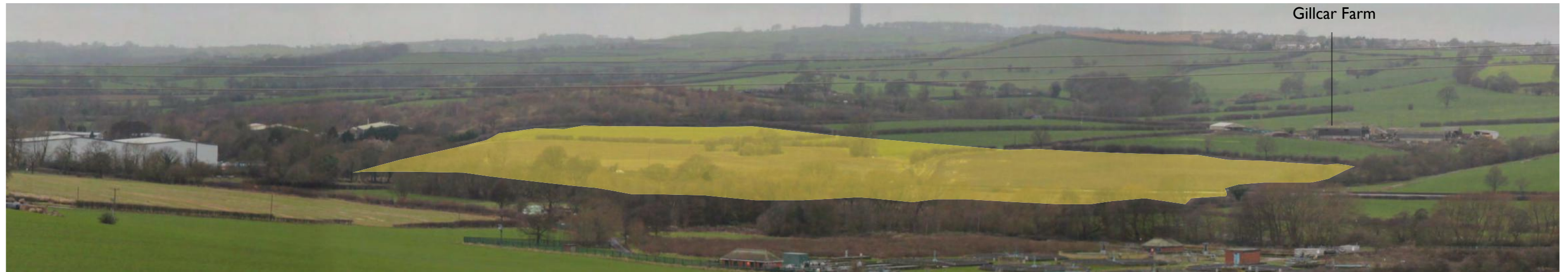


Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 3 - Public Right of Way at Litherop Road



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 4 - Dearne Way east of the site



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation is not visible from this location

Viewpoint Location 5 - Dearne Way east of the site



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 8 -View from residential properties on Whinmoor Drive



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation is not visible from this location

Viewpoint Location 9 - Kirklees Way/Wakefield Road looking west at the boundary of the KMBC allocation site



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation is not visible from this location due to the more level topography within areas of the most northern parts of the CWDCL site. Visibility of buildings within the northern part of the CWDCL site would be obscured behind development adjacent to Wakefield Road.

Viewpoint Location 11 - Clayton West cricket ground



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 12 -View towards the site from the Millennium Green



Existing view from within the Millennium Green



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 13 - Public Right of Way at Gillcar Farm at the northern boundary of the CWDCL land

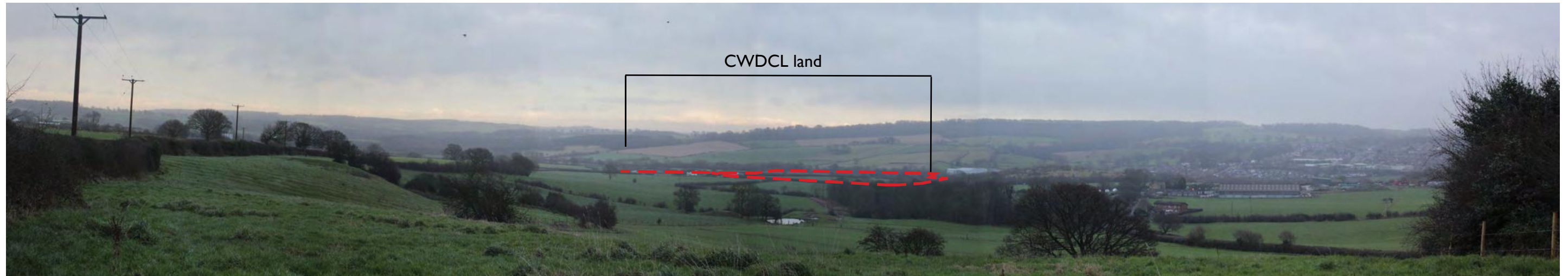


Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

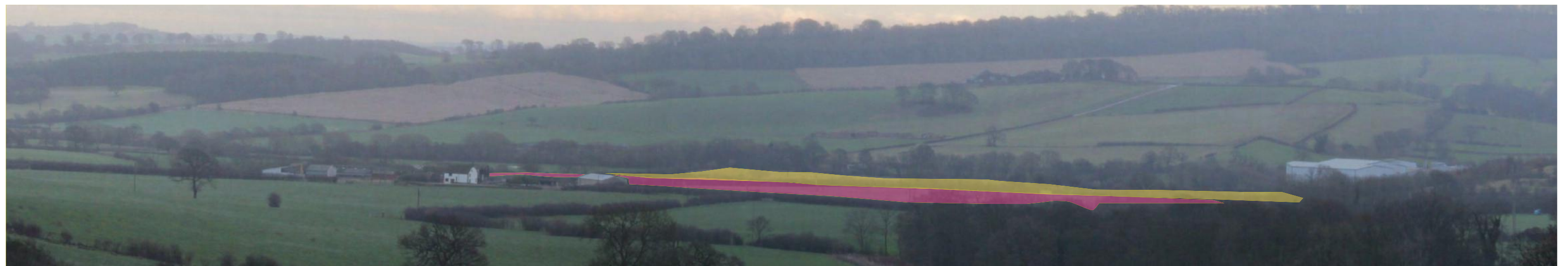
Viewpoint Location 14 - Public Right of Way at Hag Hill



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 15 - Public Right of Way near White Cross iron workings



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)

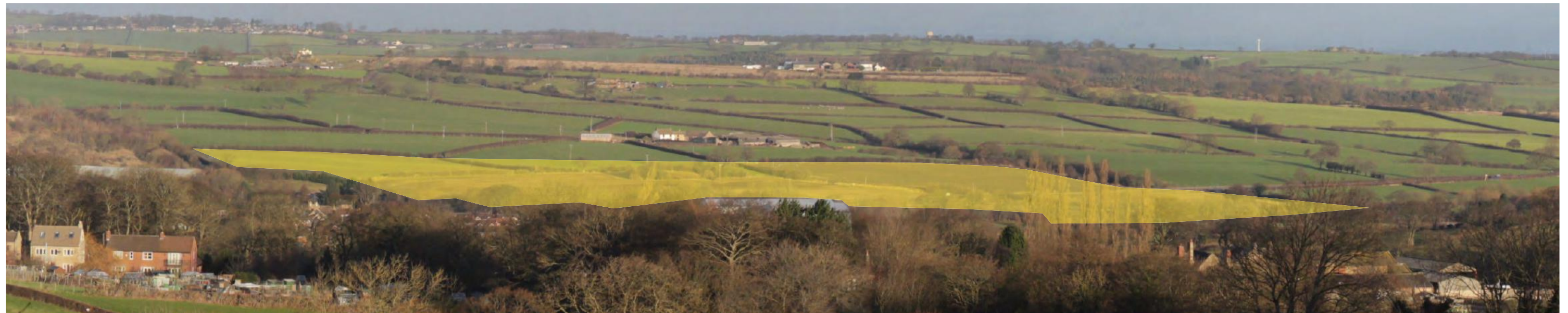


Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

Viewpoint Location 17 - Rear of residential property on Bank End Lane



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC Revised Allocation (shaded yellow)



Visibility of KMBC Revised Allocation (shaded yellow) and CWDCL Proposed Allocation (shaded pink)

3.0 Impacts upon Public Rights of Way

The Landscape Officer identifies that ‘restricting the development to the original alignment for employment (and keeping it largely to the south of the existing PROW DEN 14/10) would reduce the extent of change and impact to the users of the footpaths.’

We have reviewed the experience of users on these rights of way in relation, not only to their direct experience, but to consider the changes that could result for either the revised Kirklees allocation site, and the larger CWDCL site. The series of images below provides existing landscape context users of these Rights of Way experience upon their approach to the site(s) from the north. Having undertaken additional site appraisals of these Right of Way, we make the following observations:

- The additional length of footpath which would be directly affected by the development of the CWDCL site is 180m (between location A and Z on Figure 6).
- We consider that the truncation of the right of way DEN14/10 at the point where it connects with Gillcar Farm lane, also a PROW, would be a logical point at which walkers transition between the rural landscape to the north and development within the CWDCL site.
- By incorporating development within the wider site, a more gradual transition would be afforded to these users, as their approach from the north already incorporates clear visibility of the existing farm buildings. The inclusion of landscape to supplement the existing hedges along the track to Gillcar Farm would reflect wooded character of the wider area. Such a treatment would not be achievable within the constrained site extent of the revised KMBC site and may result in development within the site being more apparent as PROW users approach from the north.

There are key links between the impacts on users of these Rights of Way and the definition of the Green Belt edge (refer to section 4.0). Development of either site would require implementation of elements or features which act as a strong, defensible Green Belt edge.

- We consider that greater scope lies within and beyond the CWDCL site to more strongly define the Green Belt in this location and that users of a 180m stretch of footpath will not be impacted on to such an extent that the wider journey and experience of the landscape is affected.
- There is greater opportunity within the larger, CWDCL site, for the incorporation of landscape mitigation and appropriate route for the incorporation of the Right of Way within the site.
- Development of the CWDCL site we consider, would have very limited residual impact over and above that associated with the revised KMBC site allocation.

Summary of change

Based upon the indicative parameters explored within this appraisal, the anticipated magnitude of change to users of Public Rights of Way which could arise from the development of the northern part of the CWDCL site when considering the KMBC allocation site as a baseline, is considered to be **low to negligible**. When considering the increased potential to incorporate appropriate landscape belts within the CWDCL site, the residual impact could be anticipated as being **minor beneficial** in relation to the KMBC site.

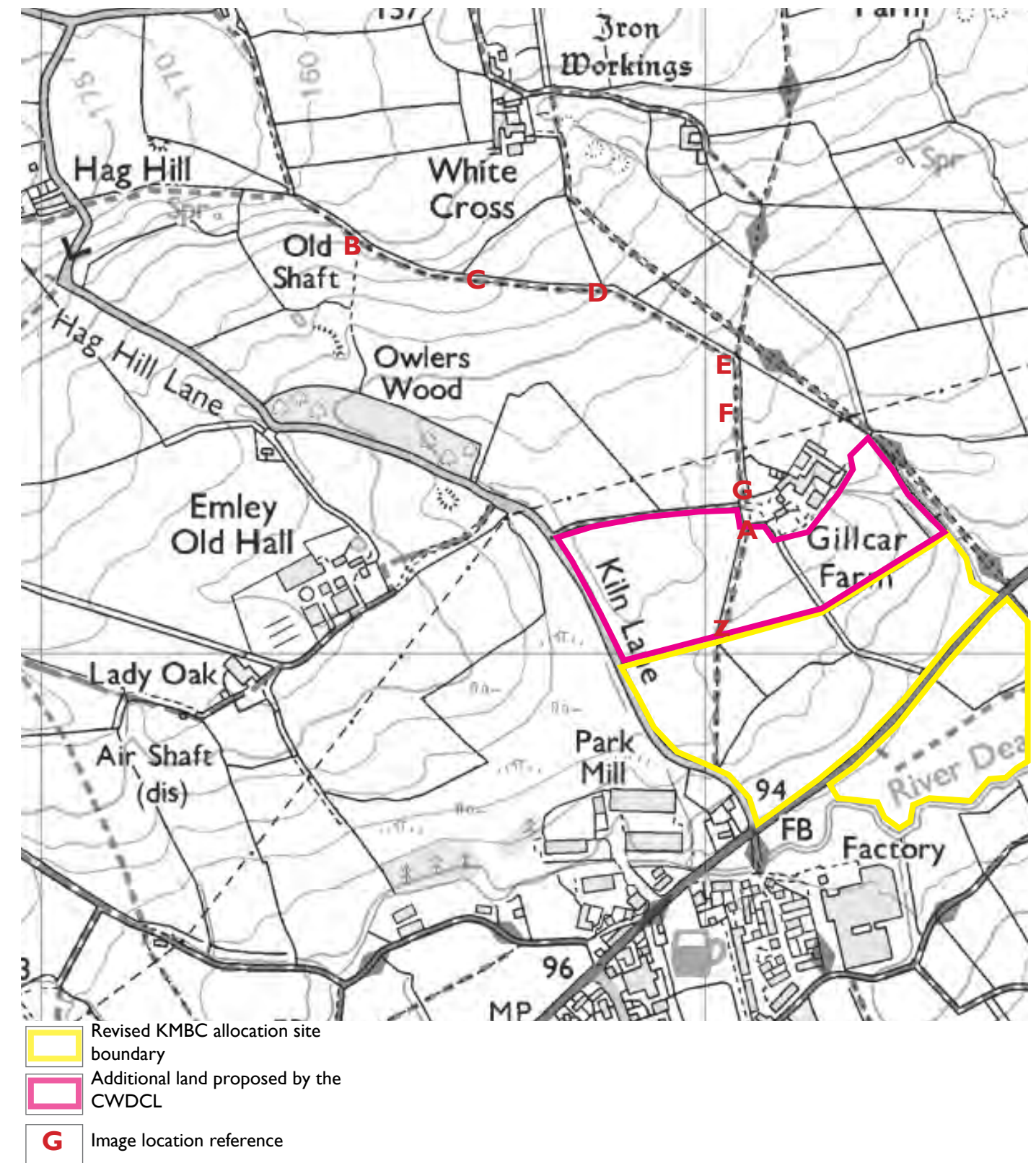


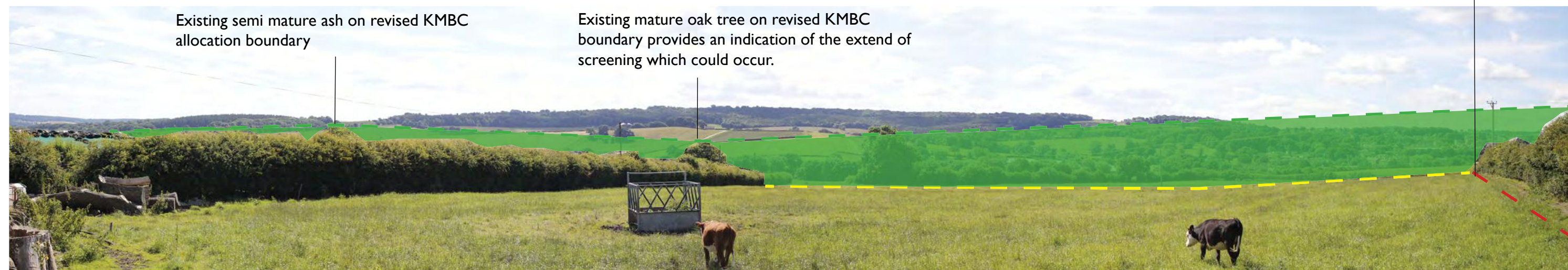
Figure 6 Image locations along Public Rights of Way to the north of the sites.

Viewpoint Location A



Approximate line of KMBC revised allocation site currently not defined on the ground but connecting existing hedgerows to the east and west. Significant new edge treatment would be required to satisfy Green Belt purpose and which would act to screen much of the distant views.

Existing view from the stile adjacent to Gillcar Farm buildings



Potential change to view from new landscape belt to define new Green Belt edge of revised KMBC allocation site

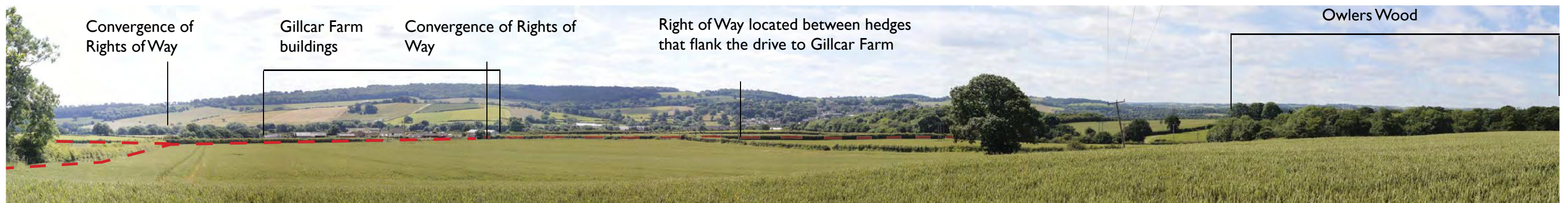
Viewpoint Location B



Viewpoint Location C



Viewpoint Location D



Viewpoint Location E



Viewpoint Location F



Viewpoint Location G



Edge of CWDCL site

Right of Way located between hedges that flank the drive to Gillcar Farm

4.0 Visual Impact on Kiln Lane

The Landscape Officer raises concerns that visual impacts for receptors on Kiln Lane (which forms the western boundary to the sites) would be increased as a result of development of the larger site extent as proposed by the CWDCL.

In undertaking an additional site appraisal for potential visual impacts along Kiln Lane, we include a series of photographs from locations indicated on Figure 7. These show the existing context to this route and the existing limited visibility into the site from Kiln Lane.

To supplement the parameters shown within the Indicative Development Strategy Plan (Figure 1) cross sections have also been prepared which demonstrate the screening currently afforded by local topography and existing hedgerows in combination with indicative development plateau levels, building heights and new landscape treatment within the site (Figure 8).

We set out our findings as follows:

- Kiln Lane is afforded a high degree of enclosure for much of its route.
- There are no pavements and the route is windy and narrow in places.
- The CWDCL site is located at a higher level than the road and is flanked by mature hedgerows (**Image L**).
- The provision of new woodland scale planting to reinforce the new green belt edge, as proposed by the CWDCL site, would reduce visibility of buildings within the site and reinforce the existing enclosed nature along parts of the route.
- Embankments to the northern parts of the CWDCL site would set development lower within these areas and combined with proposals for landscape boundary treatment would strengthen the existing landscape character and visibility into the site.

Summary of change

Based upon the indicative parameters explored within this appraisal, the anticipated magnitude of change to receptors on Kiln Lane which could arise from the development of the northern part of the CWDCL site when considering the KMBC allocation site as a baseline, is considered to be **negligible**. When considering the increased potential to incorporate appropriate landscape belts within the CWDCL site, the residual impact could be anticipated as being **neutral** in relation to the KMBC site.

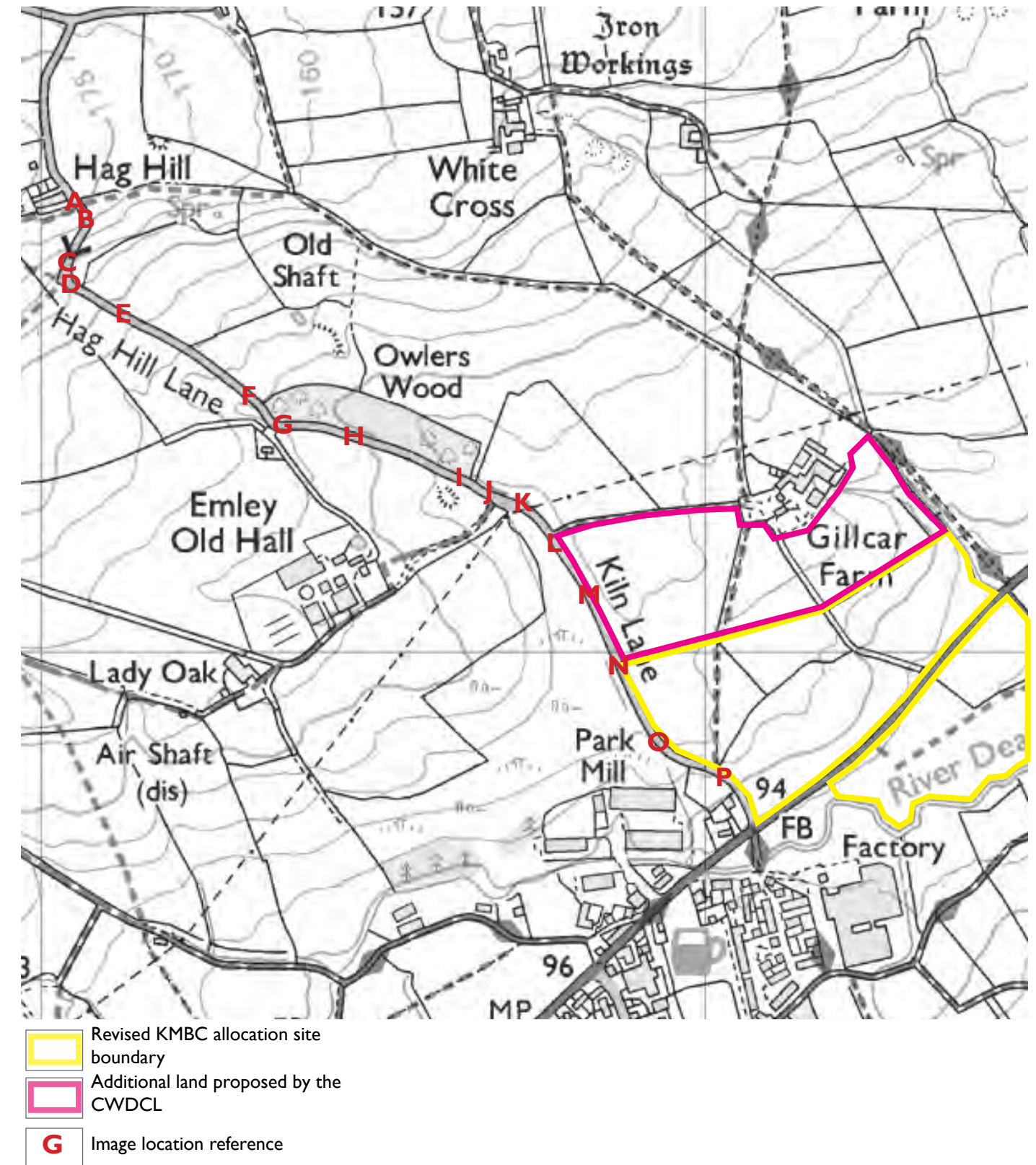


Figure 7 Image locations along Kiln Lane

A



C



B



D



E



G



F



H





M



O



N



P



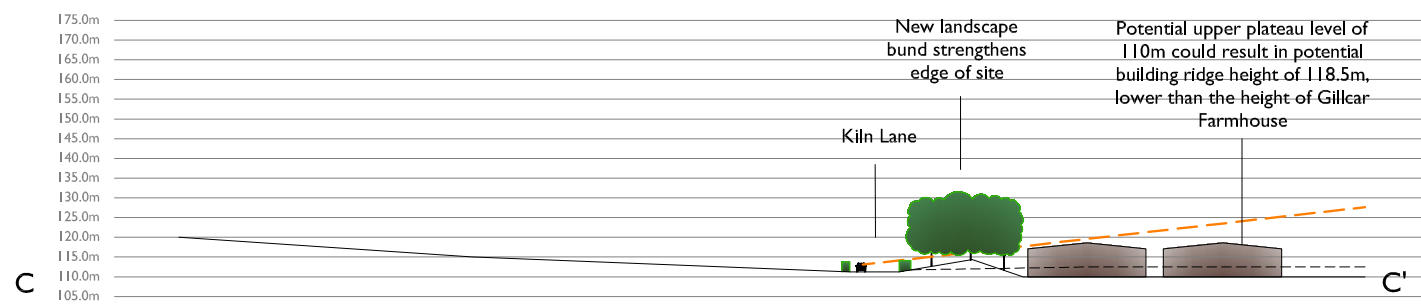
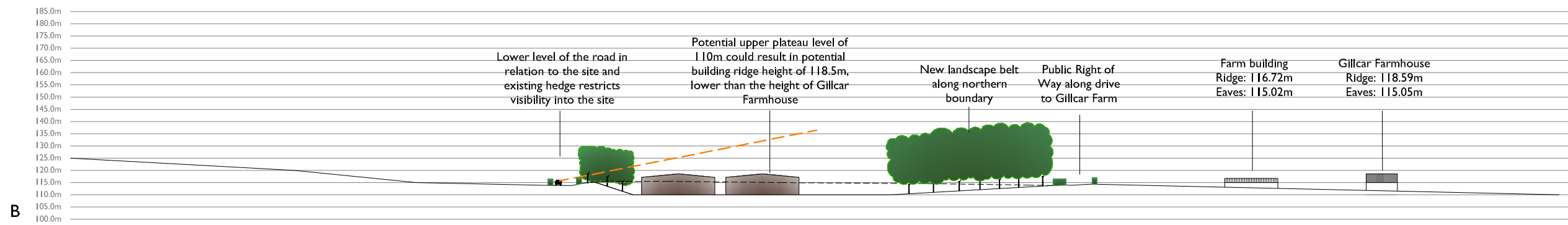
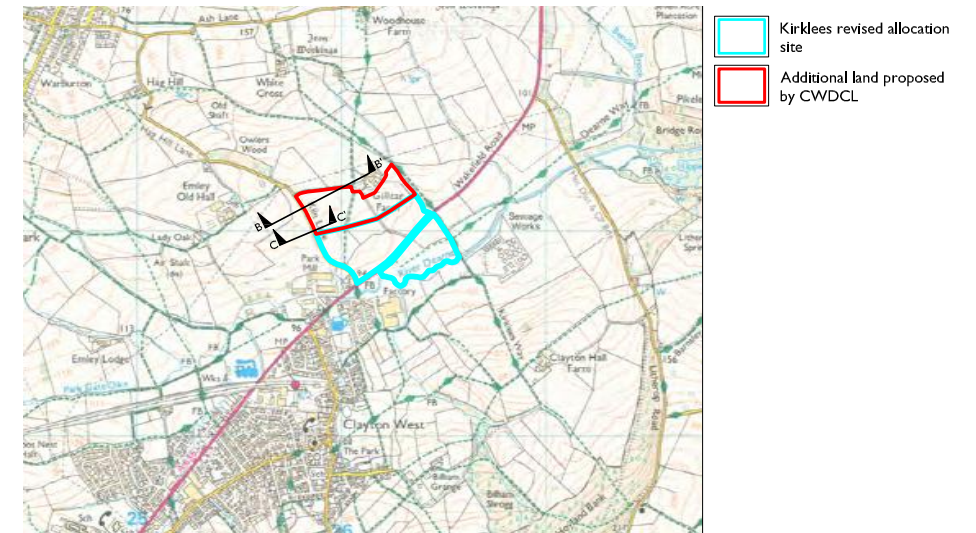


Figure 8 Cross sections showing the relationship between the CWDCL site and Kiln Lane
Scale 1:1000 at A1 (width)



5.0 Green Belt

Further to our appraisal work previously undertaken with respect to the Green Belt, we note that in the Landscape Officer's report there is no consideration of the respective site's capacity to 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent' (Para 85 of the NPPF) and no commentary upon our proposal for achieving this.

We have undertaken additional site work to interrogate the revised allocation extent which KMBC now propose and annotated photographs included in the following pages illustrate the existing condition of the northern boundaries of the KMBC and CWDCL sites.

KMBC Proposed allocation site (boundaries A, B and C on Figure 10)

- 175m (30%) of the proposed northern boundary has no existing feature on the ground (boundary A).
- Boundary B comprises a predominantly hawthorn hedge 2.5m x 1.5m wide, in good condition with few gaps with no hedgerow trees.
- Boundary C comprises a hedge 2.5m - 4m in height x 1.5m wide. Predominantly hawthorn, with some rose and elder. Gaps in places. 3No existing trees: Oak has 700mm diameter trunk. Two ash, one in decline. One with 500mm diameter trunk.
- In considering the constraints posed by the trees along this boundary, we recommend an offset of 8.5m minimum south of these trees before any level changes occur within the site. This would therefore impact upon the developable area that could be achieved by the KMBC site, notwithstanding the supplementary landscape we believe would be necessary to reinforce this insubstantial boundary when balanced with those of the CWDCL site.

CWDCL Proposed allocation site (boundaries D, E and F on Figure 10)

- Boundary D is located to the south of the driveway leading to Gillcar Farm from Kiln Lane. The drive is single vehicle width and surfaced in tarmac and is located between mature hawthorn hedgerows that extend the length of the drive, with the exception of occasional gateways. Telegraph poles are located periodically along the southern (site) side of the drive, and to the northern side, both located along the drive and within the adjacent field to the north, overhead power lines.
- Boundary E runs to the south of the group of buildings of Gillcar Farm. The farm buildings comprise a mix of stone built outbuildings and small barns, and a series of larger, more modern farm buildings/barns.
- The Public Right of Way which follows the farm drive converges with the Right of Way that connects White Cross and Clayton West, via the site(s). The point at which the footpaths connect is where boundary D and E meet, the approach to which becomes increasingly characterised by the visibility of the farm buildings and some awareness of the surrounding electrical infrastructure. A sense of arrival at this convergence point would provide a more coherent opportunity for the incorporation of the transition between the wider Green Belt and the new settlement edge.
- Boundary F, to the east of Gillcar Farm, extends approximately 50m (8% of the northern boundary) between the farm buildings and the eastern site boundary. This section of boundary is presently undefined, however it's limited extent and location adjacent to other physical elements (overhead lines and watercourse) which would act to constrain development to the north or east, significantly limit the propensity for development beyond this boundary.
- In addition to the strong existing elements along the northern boundary, the indicative development strategy proposes the enhancement of these boundaries by creating new landscape belts that response to local character and which will also reduce impacts upon visual amenity.

Summary

We consider that the CWDCL site offers the most robust solution to redefinition of the Green Belt. The site accommodates not only future developable land, but also existing features which can be strengthened within or beyond the site (if necessary) and that offers greater scope to more effectively mitigate against visual and landscape character effects, while presenting a nominal additional intrusion or harm to the landscape, rather than the 'significant intrusion and harm' stated in the Landscape Officer's report.

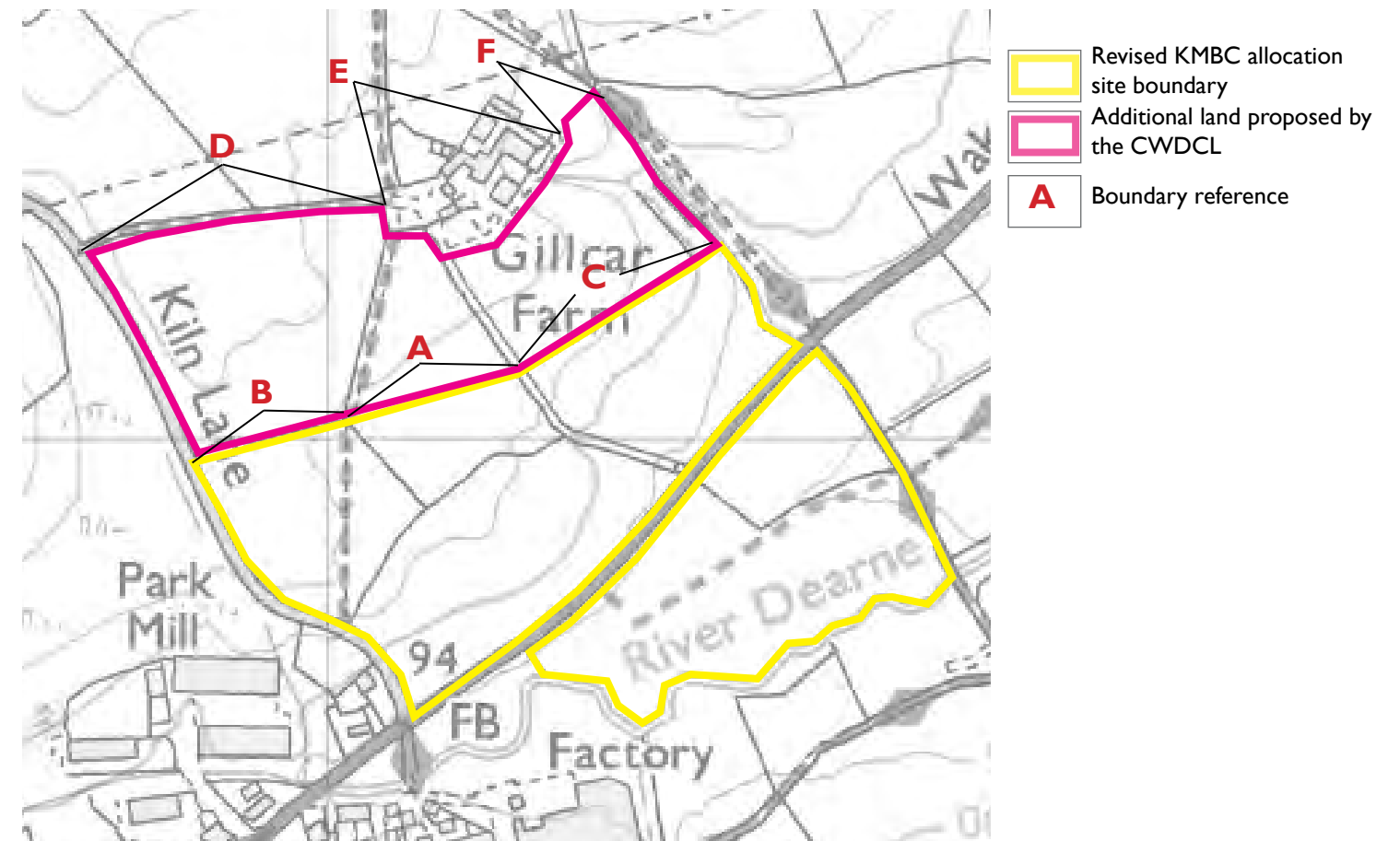


Figure 10 Northern site boundary reference plan

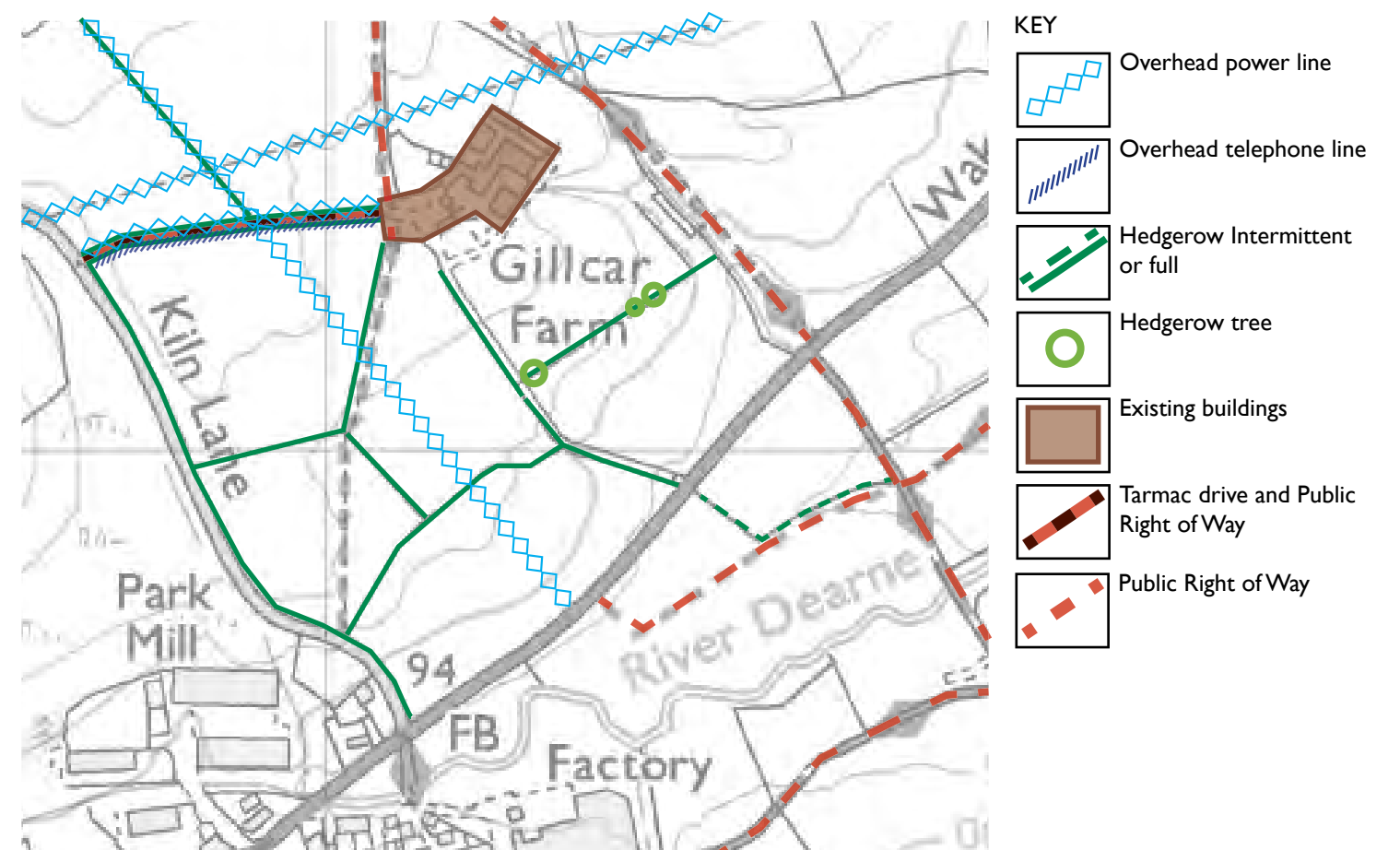
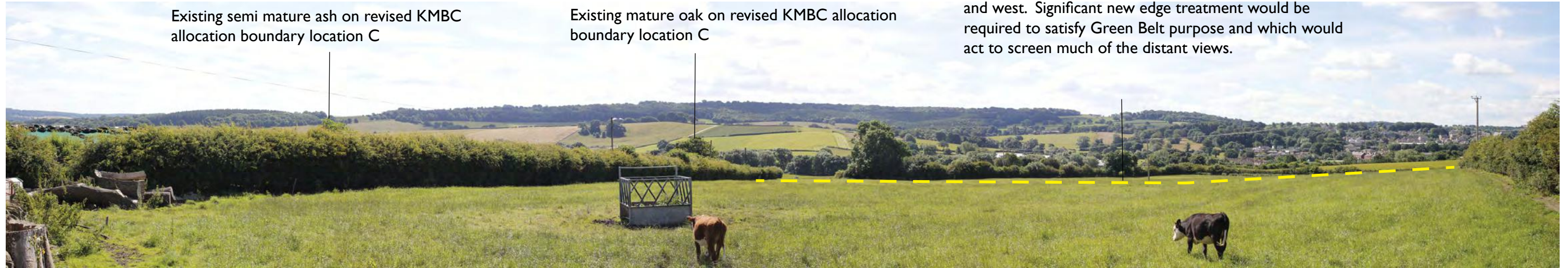


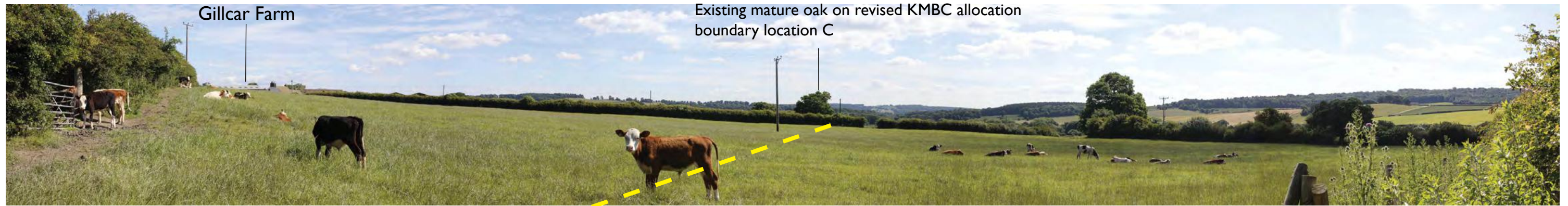
Figure 11 Site boundary types and features

Boundary A

Approximate line of KMBC revised allocation site boundary location A. Currently not defined on the ground but connecting existing hedgerows to the east and west. Significant new edge treatment would be required to satisfy Green Belt purpose and which would act to screen much of the distant views.



Existing view from the stile adjacent to Gillcar Farm buildings

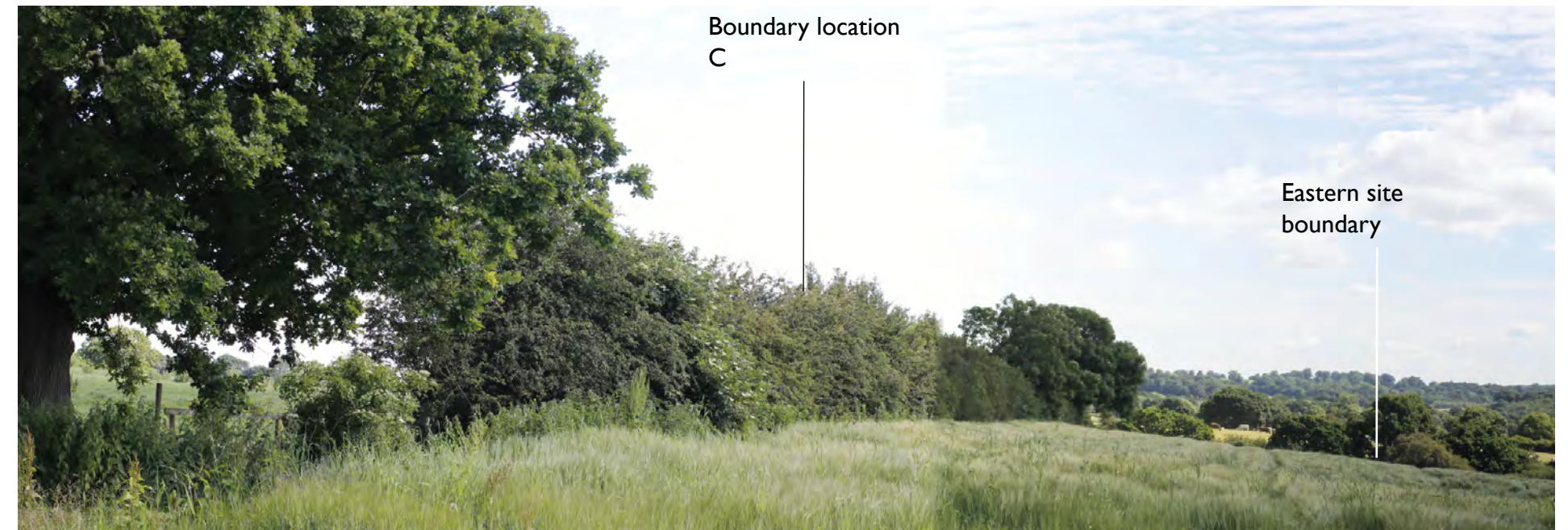


Boundary B



2.5m x 1.5m wide. Predominantly hawthorn, with very occasional elder.

Boundary C



2.5m - 4m in height x 1.5m wide. Predominantly hawthorn, with some rose and elder. Gaps in places. 3No existing trees: Oak has 700mm diameter trunk. Two ash, one in decline. One with 500mm diameter trunk. We recommend an offset of 8.5m minimum south of these trees before any level changes occur within the site.

Boundary D

CWDCL Site south of the hedgerow

Public Right of Way

Hedge to the north of the drive leading to Gillcar Farm



Boundary E



Existing telephone line and overhead power lines run adjacent to the driveway



CWDCL site behind farm

Public Right of Way

6.0 Summary and Conclusions

The Landscape Officer concludes that *'the effect of extending the development beyond the original alignment, up onto the higher ground would have greater adverse effect in terms of visual impact and change to character. The built form will be considerably more intrusive and the larger development will significantly increase the potential harm to the landscape'*. However, we note that

As set out within appraisal work undertaken in response to the Landscape Officers' report, we provide additional detail which illustrates the way in which:

1. The CWDCL site reflects the topographical and adjacent settlement context, the most northern part of which is little higher in elevation than land contained within the revised KMBC site and therefore wouldn't be perceived as extending further up the valley side.
2. Development of the most northern parts of the CWDCL site would have nominal impact upon wider visual amenity.
3. Development of the most northern parts of the CWDCL site would have an impact upon a short stretch of an existing Right of Way and provides a stronger, well defined settlement edge to approaches from the north.
4. Inclusion of the most northern parts of the CWDCL site enable the incorporation of appropriate landscape treatment within which the PROW within the site can be re-routed to provide a safe, accessible route into Clayton West.
5. Development of the most northern parts of the CWDCL site would have nominal impact upon visual amenity from Kiln Lane.
6. The removal of the CWDCL site from the Green Belt provides a more robust new Green Belt edge than the revised KMBC site whereby existing above ground elements within the landscape, in combination with the extent of new landscape treatment that can be accommodated within the site presents a more strongly defensible settlement limit.

For the reasons set out above and as demonstrated within both our original site appraisal and this supplementary information, we consider that the CWDCL site presents an appropriate site for development. It is hoped that the additional information contained within this document provides some indicative parameters which can guide planning applications, and which will give comfort that building scale within the northern parts of the site can be defined to allay concerns that development in this location would present the 'much greater magnitude' of impacts that the Landscape Officer anticipates and also that it therefore presents the most sustainable option when considering the long term requirements for developable land in combination with appropriate mitigatory landscape and robust Green Belt definition.