

Environmental Statement
Addendum (ESA) – Volume 1
Keyland

Redevelopment of Former North Bierley
WWTW
November 2017

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This Environmental Statement Addendum (ESA) is accompanied by Technical Appendices – Volume 2 and a Non-Technical Summary.

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November 2017

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ABBREVIATIONS

AADT	Annual Average Daily Total flow
AOD	Above Ordnance Datum
BAP	Biodiversity Action Plan
BBS	Breeding Bird Survey
BEMP	Biodiversity Ecology Management Plan
BGS	British Geological Society
BMDC	Bradford Metropolitan District Council
CEMP	Construction Environmental Management Plan
DEFRA	Department of Environment Food and Rural Affairs
DFT	Department for Transport
DMRB	Design Manual for Roads and Bridges
EA	Environmental Agency
EC	European Commission
EcIA	Ecological Impact Assessment
EIA	Environmental Impact Assessment
ELC	European Landscape Convention
ES	Environmental Statement
ESA	Environmental Statement Addendum
EU	European Union
FRA	Flood Risk Assessment
GLVIA	Guidelines for Landscape and Visual Impact Assessment
GQRA	Generic Quantitative Risk Assessment
HA	Highways Agency
HCA	Homes and Communities Agency
HDV	Heavy Duty Vehicle

IEEM	Institute of Ecology and Environmental Management
JNCC	Joint Nature Conservation Committee
km	Kilometres
km/hr	Kilometres per hour
KMBC	Kirklees Metropolitan Borough Council
LAQM	Local Air Quality Management
LCA	Landscape Character Area
LCT	Landscape Character Types
LDV	Light Duty Vehicle
LDF	Local Development Framework
LNR	Local Nature Reserve
LVIA	Landscape and Visual Impact Assessment
mg/m³	Milligrams (of pollutant) per cubic meter (of air)
m	Metres
mm	Millimetres
NBN	National Biodiversity Network
NCA	National Character Areas
NCN	National Cycle Network
NPPF	National Planning Policy Framework
NRTF	National Road Traffic Forecast
NTS	Non Technical Summary
NVC	National Vegetation Classification
ODPM	Office of Deputy Prime Minister
ONS	Office for National Statistics
OS	Ordnance Survey
PRoW	Public Right of Way

RSPB	Royal Society for the Protection of Birds
SAC	Special Areas of Conservation
SCOPSA	Standing Conference of South Pennines Authorities
SFRA	Strategic Flood Risk Assessment
SPA	Special Protection Areas
SPD	Supplementary Planning Document
SSSI	Sites of Special Scientific Interest
SUDS	Sustainable Urban Drainage System
TA	Transport Assessment
TG	Technical Guidance
UDP	Unitary Development Plan
UKAS	United Kingdom Accreditation Service
UKBAP	UK Biodiversity Action Plan
VER	Valued Ecological Receptors
VP	Viewpoint
WwTW	Wastewater Treatment Works
ZTV	Zone of Theoretical Visibility
ZVI	Zone of Visual Interest

GLOSSARY

Term	Meaning Adopted in this Assessment
Annual average daily total flows	A daily traffic flow (24hrs), expressed as a mean daily flow across all 365 days of the year (AADT) in units of vehicles per hour
Baseline scenario	Scenarios with the proposed development/project not in operation
Construction Environmental Management Plan	A framework developed to address and manage the environmental aspects and impacts related to the construction of the proposed development/project
DMRB screening tool	An empirical computer modelling tool that predicts future air quality levels as a result of road traffic characteristics under different scenarios
Heavy Duty Vehicle	<p>A vehicle type classification, including rigid and articulated heavy goods vehicles, plus buses and coaches, that is used by air quality dispersion models</p> <p>A vehicle type classification, including motorcycles, cars and light goods vehicles, that is used by air quality dispersion models</p>
Light Duty Vehicle / Road links	Individual sections of the road network, usually divided by junctions, used in the modelling of scenarios
24 hour mean concentration	The average (mean) of the hourly pollutant concentrations measured or predicted for 24 consecutive hours in one day
Landscape and Visual Impact Assessment (LVIA)	A tool used to identify and assess the likely significance of the effects of change resulting from development both on the landscape as an environmental resource in its own right and on people's views and visual amenity.
Landscape Character	A distinct, recognisable and consistent pattern of elements in the landscape that makes one

	landscape different from another, rather than better or worse.
Landscape Character Areas (LCAs)	These are single unique areas which are the discrete geographic areas of a particular landscape type.
Landscape Character Assessment (LCA)	The process of identifying and describing variation in the character of the landscape, and using this information to assist in managing change in the landscape. It seeks to identify and explain the unique combination of elements and features that make landscape distinctive. The process results in the production of a Landscape Character Assessment.
Landscape Character Types (LCTs)	These are distinct types of landscape that are relatively homogenous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical land use and settlement pattern, and perceptual and aesthetic attributes.
Landscape Effects	Effects on the landscape as a resource in its own right.
Landscape Quality (condition)	A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.
Landscape Receptors	Defined aspects of the landscape resource that have the potential to be affected by a proposal.
Landscape Value	The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons.
Magnitude (of effect)	A term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration.

Photomontage	A visualisation which superimposes an image of a proposed development upon a photograph or series of photographs.
Sensitivity	A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.
Significance –	A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic.
Visual Amenity	The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.
Visual Effects	Effects on specific views and on the general visual amenity experienced by people.
Visual Receptors	Individuals and /or defined groups of people who have the potential to be affected by a proposal.
Visualisation	A computer simulation, photomontage or other technique illustrating the predicted appearance of a development.
Zone of Theoretical Visibility (ZTV, sometimes Zone of Visual Influence)	A map, usually digitally produced, showing areas of land within which a development is theoretically visible.

A1 Introduction

A1.1 Keyland (“the applicant”) has applied for planning permission (LPA ref 2016/60/92298/E and 16/06164/MAO) to Kirklees Council (“KMBC”) and Bradford Council (“BDMC”) respectively, to redevelop the former North Bierley Waste Water Treatment Works (WWTW) and adjacent agricultural land for employment and residential purposes with associated access and landscaping and provide a new car park for Woodlands Church of England School.

A1.2 Following feedback during the planning application process, the Proposed Development description is amended to remove residential development, as follows:

“Re-development of former waste water treatment works following demolition of existing structures to provide employment uses (Use Classes B1(c), B2 and B8) on land off Cliff Hollins Lane and provision of a school car park for Woodlands Primary School on land off Mill Carr Hill Road (outline application – all matters reserved)”

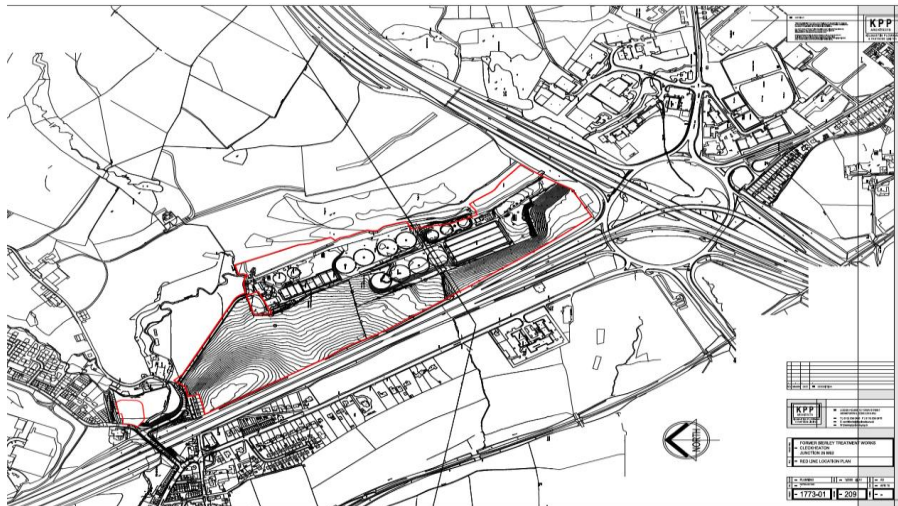


Figure A1.0: Site boundary outlined in red.

A1.3 This planning application site boundary primarily lies within the administrative area of KMBC, with the area for the new school car park lying within the administrative area of BDMC. As a consequence, the planning application and accompanying Environmental Statement (**Addendum Technical Appendix A1.0 and A1.1**) was submitted to both KMBC and BDMC in July 2016.

A1.4 This Environmental Statement Addendum (ESA) has been prepared for the following reasons:

- Further environmental information: During the course of the planning application consideration, feedback has been received from the highways departments at KMBC and BDMC, the environmental health officer at KMBC and the Highways England. Further environmental information has been prepared in response to the feedback provided and is included in this Environmental Statement Addendum.

- Revised Proposals: Since the application was submitted in July 2016, Highways England has indicated that additional land to that allowed for in the parameters plan may be required to deliver improvements to the Chainbar roundabout (Junction 26 of the M62). Highways England is not yet able to advise which options are being considered, and therefore the proposed development has been revised. In particular, the revised proposals: remove an area of land to the south from the developable area, provides land to the west for potential improvements to the M606; removes residential development from the scheme; and revises the building plateaus. New parameter plan and plateau plan have been prepared and are provided in **Addendum Technical Appendix A1.2**. The original development proposal considered in the July 2016 ES no longer forms the proposed development.

A1.5 This ESA Chapter replaces Chapter 1 of the July 2016 ES in its entirety, and has been prepared by Turley.

Reasons for EIA

- A1.6 The original ES was prepared under EC Directive 2011/92/EU which was transposed into UK law through the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 [Ref A1.1] as amended, in 2015 [Ref A1.2].
- A1.7 Since the July 2016 ES was prepared the Government has enacted the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (“2017 EIA Regulations”) [Ref A1.3]. These Regulations came into force on the 16th May 2017, and in the majority of instances revoke the preceding 2011 Regulations as amended in 2015. This Environmental Statement Addendum (ESA) has been prepared in accordance with the 2017 EIA Regulations.
- A1.8 EIA has been undertaken voluntarily by the Applicant. This is on the basis that the applicant considers the Proposed Developments is an urban development project which constitutes EIA Development under Schedule 2 Part 10b of the EIA Regulations due to its size, scale and nature. Consideration has been given to the reduced threshold for industrial development and criteria for such development in the 2017 EIA Regulations.
- A1.9 The Applicant has not submitted a “Screening Opinion Request” or “Scoping Opinion Request” to the Council.
- A1.10 The scope of this ESA is considered further in Chapter 2A, Approach to EIA.
- A1.11 Consequently, the prescribed EIA information including describing the Proposed Development, the likely significant environmental effects (during construction and operation) and the proposed ways to prevent, reduce and offset any significant adverse effects on the environment, known as mitigation measures, has been gathered and is presented in the July 2016 ES and, has been reviewed and updated as necessary in this ESA .

Structure of the ESA

- A1.12 The ESA is provided in three parts:

Non-technical summary (NTS)

Volume 1: Main text and figures;

Volume 2: Addendum Technical Appendices

A1.13 The ESA should also be read alongside the documents submitted with the planning application (detailed in paragraph A1.22 below).

The ESA – Non-Technical Summary

A1.14 A non-technical summary (NTS) has been produced as a freestanding document. The NTS provides a concise summary of the whole ESA in non-technical language to be understood by a lay audience.

The ESA Volume 1 – main body

A1.15 This is the full text of the ES and comprises a total of 15 chapters which are illustrated throughout by a series of tables and figures. It presents details required by the EIA Regulations and it is supported by Volume 2.

A1.16 The 2017 EIA Regulations (Schedule 4) identifies a requirement for the Application to include in an ES information that is:

“reasonably required to assess the environmental effects of the development and which the application can, having regard in particular to current knowledge and methods of assessment, reasonably be required to compile.”

A1.17 The list of requirements in the 2017 EIA Regulations is a combination of the previous requirements set out in Part 1 and Part 2 of Schedule 4, and expanded requirements (specifying what issues to be considered under certain topics) and new requirements (such as impact on human health).

A1.18 An outline of what this information comprises in respect of the Proposed Development and where it can be found in the ESA is presented in **Table A1.0**.

Table A1.0: Structure and content of ESA – Schedule 4 of 2017 EIA regulations

Specified Information		Location in ES
1. Description of development including in particular:	a) a description of the location development	Chapter 3 Existing Site and Surroundings July 2016 ES

Specified Information	Location in ES
<p>b) A description of the physical characteristics of the whole development, including where relevant, requisite demolition works, and the land use requirements during the construction and operational phases.</p>	<p>Chapter 3 Existing Site and Surroundings July 2016 ES; Chapter A4 The Proposed Development ESA 2017</p>
<p>c) A description of the main characteristics of the operational phase of development (in particular any production process), for instance energy demand and effects. energy used, nature and quantity of the materials and natural resources (including water, land, soil and biodiversity) used;</p>	<p>Chapter A4 The Proposed Development ESA 2017 and technical chapters so far as relevant to the assessment of significant environmental effects.</p>
<p>d) An estimate, by type and quantity, of expected residues and emissions (water, air and soil pollution, noise, vibration, light, heat, radiation, and quantities and types of waste produced during the construction and operation phases.</p>	<p>Chapter A4 The Proposed Development and all technical chapters so far are relevant to the assessment of significant environmental effects.</p>
<p>2. A description of the main alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.</p>	<p>Chapter 5 Consideration of Alternatives July 2016 ES and Chapter A5 Consideration of Alternatives ESA 2017.</p>

Specified Information	Location in ES
<p>3. A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge.</p>	<p>Technical chapters 6-13 of the July 2016 ES; and technical chapters A6-A13 of the ESA 2017, as relevant.</p>
<p>4. A description of the factors specified in regulation 4(2) likely to be significantly affected by the development: population, human health, biodiversity (for example fauna and flora), land (for example land take), soil (for example organic matter, erosion, compaction, sealing), water (for example hydromorphological changes, quantity and quality), air, climate (for example (greenhouse gas emissions, impacts relevant to adaptation), material assets, cultural heritage, including architectural and archaeological aspects, and landscape.,</p>	<p>Technical chapters 6-13 of the July 2016 ES; and technical chapters A6-A13 of the ESA 2017, as relevant.</p>
<p>5 A description of the likely significant effects of the development on the environment resulting from inter alia:</p>	<p>a) the construction and existence of the development including, where relevant, demolition works; Chapter A4 Proposed Development ESA 2017 technical chapters 6-13 of the July 2016 ES; and technical chapters A6-A13 of the ESA 2017</p>

Specified Information	Location in ES
b) the use of natural resources, in particular land, soil, water and biodiversity, considering as far as possible the sustainable availability of these resources;	Chapter A4 The Proposed Development ESA 2017, technical chapters 6-13 July 2016 ES and chapters A6-A13 ESA 2017, as relevant.
c) the emission of pollutants, noise, vibration, light, heat and radiation, the creation of nuisances, and the disposal and recovery of waste	Chapter A4 The Proposed Development ESA 2017, technical chapters 12 and 13 July 2016 ES; and chapters A12 and A13 of the ESA 2017, as relevant.
d) the risk to human health, cultural heritage or the environment (for example due to accidents or disasters);	Chapter A2 Approach to EIA and A4 The Proposed Development; technical chapters A7-A13 of the ESA 2017
e) the cumulative effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of material resources;	Technical chapters 6-13 July 2016 ES; chapters A6- A13 of the ESA 2017, as relevant; and A15 Summary of Interactive and Cumulative Effects of the ESA 2017
f) the impact of the project on climate (for example the nature and magnitude of greenhouse gas emissions) and the vulnerability of the project to climate change;	Chapter A4 The Proposed Development ESA 2017; technical chapters 12 and 13 July 2016 ES; and technical chapters A6-A13 of ESA 2017 as relevant.
g) the technologies and substances used	Chapter A4 The Proposed Development ESA 2017

Specified Information	Location in ES
<p>6. A description of the forecasting methods or evidence used to identify and assess significant effects on the environmental, including details of difficulties (for example technical deficiencies or lack of knowledge) encountered compiling the required information and the main uncertainties involved.</p>	<p>All technical chapters (6-13) of the July 2016 ES, as relevant; and technical chapters A6-A13 of ESA 2017, as relevant.</p>
<p>7. A description of the measures envisaged to prevent, reduce and where possible offset any significant adverse effects on the environment, and where appropriate, of any proposed monitoring arrangements (for examples the preparation of post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.</p>	<p>All technical chapters (6-13) of the July 2016 ES; and technical chapters A6-A13 of ESA 2017 as relevant, and Chapter A15 Summary of Residual Effects and Mitigation ESA 2017</p>
<p>8. A description of the expected significant adverse effects of the development on the environment deriving from the vulnerability of the development to risks of major accidents and/or disasters, which are relevant to the project concerned.</p>	<p>Chapter A2 The Approach to EIA and Chapter A4 The Proposed Development ESA 2017.</p>
<p>9. A non-technical summary of the information provided under paragraphs 1 to 5 of this Part.</p>	<p>ESA Non-Technical Summary (separate document)</p>

Specified Information	Location in ES
10 A reference list detailing the sources used for the descriptions and assessments included in the environmental statement.	All technical chapters 6-13 July 2016 as identified and technical chapters A6-A13 of the ESA 2017,

The structure of the ES includes the following Chapters which set the context to the scheme, including:

- Chapter A1 Introduction.
- Chapter A2 Approach to EIA
- Chapter A3 Existing Site and Surroundings – July 2016 ES extant in full
- Chapter A4 The Proposed Development – July 2016 ES replaced in its entirety
- Chapter A5 Consideration of Alternatives - July 2016 ES extant in full

Chapters A6-13 provide an assessment of the environmental effects on a topic by topic basis as follows:

- Chapter A6 Socio-economic
- Chapter A7 Landscape and Visual - July 2016 ES replaced in its entirety
- Chapter A8 Ground conditions
- Chapter A9 Ecology
- Chapter A10 Flood Risk and Drainage
- Chapter A11 Transportation
- Chapter A12 Noise and Vibration
- Chapter A13 Air Quality - July 2016 ES replaced in its entirety

A1.19 In addition, the ESA includes the following Chapters:

- Chapter A14 Residual Interrelated and Cumulative Effects
- Chapter A15 Summary of Residual Effects - July 2016 ES replaced in its entirety

A1.20 Figures are provided either within each chapter, or where there are a large number as an Addendum Technical Appendix, as relevant.

The ESA Volume 2 – Addendum Technical Appendices

A1.21 A complete set of technical appendices is provided for reference to prevent the main parts of the ESA becoming excessively long.

Application documents

A1.22 Whilst they do not form part of this ESA, the following documents have been submitted with the planning application:

- Planning Statement, prepared by Turley
- Statement of Community Involvement, prepared Turley
- Drgs Parameters Plan and Plateau Plans prepared by KPP
- Drgs Site access arrangements and off-site improvements prepared by AECOM

Project Design Team

A1.23 The other Chapters have been prepared by:

- Chapter 6 – Socio-economic - Turley
- Chapter 7 – Landscape and Visual – TGP
- Chapter 8 – Ground Conditions – Wardell Armstrong
- Chapter 9 – Ecology – Brooks Ecology
- Chapter 10 – Flood Risk and Drainage - Curtins
- Chapter 11 – Highways and Transport – Aecom
- Chapter 12 – Noise – Aecom
- Chapter 13 – Air Quality – Aecom

A1.24 In line with Part 5 (18(5)) **Table A1.2** sets out the relevant expertise or qualifications of those involved in preparing this ESA

Chapter	Author/Contributor	Qualifications
A1. Introduction	Turley	
	Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI
A2. Approach to EIA	Turley	
	Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI
A3. Description of Site	Turley	
	Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI
A4. Proposed Development	Turley	
	Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI
A5. Consideration of Alternatives	Turley	
	Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI
A6. Economy	Turley	
	Richard Laming (Senior Director – Head of Economics)	BA (Hons) DiPTP, MRTPI
	Fiona Elton (Consultant)	MPLAN MRTPI
A7. Landscape and Visual	Topia Landscape Architects	
	Sue Firth (Director)	BSC (Tech) Hons Applied Biology, BLD Landscape Design, CMLI Chartered

		Landscape Architect
	TGP North Ltd Andrew Gardner (Director)	MA (Hons) Landscape Architecture, CMLI Chartered Landscape Architect
A8. Ground Conditions	Wardell Armstrong Penny Longstaff (Principal Environmental Consultant)	BSc(Hons) and MSc.
A9. Ecology	Brooks Ecology Ltd Christopher Shaw (Ecologist)	BSc (Hons), ACIEEM
A10. Flood Risk and Drainage	Curtins Stuart Baker (Associate)	BEng (Hons Civil Engineering)
A11. Transportation	AECOM Stephen Moss (Associate Director, Transportation)	BEng (Hons) CEng MICE MCIHT
A12. Noise and Vibration	AECOM Nathan Green (Acoustic Consultant, Environment and Ground Engineering)	BSc (Hons), AMIOA
A13. Air Quality	AECOM Kevin Turpin (Principle Scientist)	Ph.D. in Transport Emissions, De Montfort University: 1st Class Honours, University Of West of England. Member of the Institute of Air Quality Management: Member of the Institution of Environmental Sciences

	Tom Stenhouse (Associate Director)	Ph.D. in Atmospheric Chemistry, University Of Cambridge: MChem (Master of Chemistry): 1st Class Honours, University Of Leeds. Member of the Institution of Environmental Sciences: Member of the Institute of Air Quality Management: Chartered Environmentalist
A14. Inter-active and Cumulative Effects	Turley Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI
A15. Summary of Mitigation and Residual Effects	Turley Marianne McCallum (Associate Director)	BSC(Hons) DiPTP, MRTPI

Environmental Statement

A1.24 For the avoidance of doubt the Environmental Statement (ES) for this Proposed Development comprises:

- July 2016 ES Volume 1 Main Text; Volume 2 Technical Appendices (**Addendum Technical Appendix A1.0 and A1.1**)
- ESA 2017 Volume 1 Main Text; Volume 2 Addendum Technical Appendices; and Non-technical Summary.

Comments

A1.25 Comments on the Planning Application and ES should be forwarded to: Kirklees Metropolitan Borough Council at:

Team Leader Major Developments
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Civic Centre 3
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Hall Ings
Bradford,
BD1 1HX.

Availability of Documents

A1.26 Additional copies of the NTS (free of charge) and the ES and Technical Appendices A2.2 (price on application) are available from:

Turley
2 Bond Court
Leeds
LS1 2JZ

References

- A1.1 Town and Country (Environmental Impact Assessment) Regulations 2011
- A1.2 Town and Country (Environmental Impact Assessment) Regulations 2015
- A1.3 Town and Country (Environmental Impact Assessment) Regulations 2017

A2. Approach to EIA

A2.1 This Chapter of the July 2016 ES (**Addendum Technical Appendix A1.0 and A1.1**) sets out the methodology for undertaking the ES. In this chapter comments are made with regard to each section of the Approach to EIA Chapter 2 of the July 2016 ES in order to clarify whether the information presented remains valid, or whether changes to the approach undertaken have been made.

A2.2 The following paragraph is new text

Approach to ESA

A2.3 This ESA reviews the assessment undertaken in the July 2016ES and then provides updates or new assessments where necessary. In the case of the Chapter 7 Landscape and Visual Assessment and Chapter 13 Air quality, the July 2016 ES Chapters have been replaced in their entirety. In all other technical chapters, the author has reviewed the specific July 2016 ES chapter in detail and provided confirmation where the original text remains valid, or provided new text where updates are required. The same structure is used for each Chapter assist the reader. Updated Technical Appendices are also provided, where necessary and are included in Volume 2 of the ESA.

A2.4 The Environmental Statement for the Proposed Development therefore comprises this ESA 2017 and the July 2016 ES including technical appendices as provided in **Technical Appendix A1.0 and A1.1**.

Introduction

A2.5 The Chapter 2 of the July 2016 ES remains valid in terms of paragraphs 2.1 to 2.5.

Screening and Scoping of the ES

A2.6 Paragraph 2.6 of the July 2016 ES is valid except that reference to the “2011 Regulations” should now read “2017 EIA Regulations”. [Ref 1.3]

A2.7 The following text should be added after 2.6 *“It is noted that the 2017 EIA Regulations Schedule 2 reduces the thresholds for industrial estate development projects from 5ha to 0.5ha. This change does not affect the Proposed Development as EIA is being undertaken voluntarily.”*

A2.8 Paragraphs 2.7 to 2.10 of the July 2016 ES remain valid.

Approach to the ES

A2.9 Paragraph 2.11 of the July 2016 ES (**Addendum Technical Appendix 1.0**) advised that the application was assessed on the basis of the drawings submitted with the application. This paragraph is replaced with *“A full description of the Proposed Development considered in the July 2016 ES is set out in **Chapter 4** with the key associated drawings provided in **Technical Appendices 4.1 and 4.2**. Since the July*

2016 ES was prepared the Proposed Development description has changed to exclude residential development anywhere on site. As a consequence, this ESA provides a revised Description of Proposed Development, **Chapter A4 (Addendum Technical Appendix A4.0)** and it is this Proposed Development that is assessed in the preceding technical chapters.”

- A2.10 The following paragraphs are provided after paragraph 2.11 of the July 2016 and consider the new requirements of the 2017 EIA Regulations.
- A2.11 *Since the July 2016 ES was prepared the new EIA Regulations 2017 have been issued. Schedule 4 as referenced in Chapter A2, includes a number of more detailed or new requirements, which were not in the previous EIA regulations.*
- A2.12 *In terms of the need to consider the impact of the development on human health, the July 2016 ES and this ESA 2017 consider the potential impact on human health from ground conditions and contamination, water, traffic, noise, and air quality – topic chapters A8, A10, A11, A12 and A13. These chapters are supported, as necessary, but Addendum Technical Appendices Volume 2 of the ESA 2017*
- A2.13 *It is noted that the site is crossed by a high pressure gas pipeline which is operated by Northern Gas Networks. Both the HSE and Northern Gas Networks were consulted on the proposals and have raised no objections. It is considered that with standard tried and tested measures in place regarding easements from the line as well as construction methods, there will not be any significant risks to human health or an elevated risk of a major accident, hazard or disaster that may affect people or other environmental receptors on or around the site.*
- A2.14 *The potential environmental effects of climate change on the development is considered in relation to flood risk and drainage, Chapter A10.*
- A2.15 *it is considered that there are no other issues or topics raised by the 2017 EIA Regulations that are not already covered in the July 2016 ES or this ESA.*

Approach to ES

- A2.16 Paragraphs 2.11 to 2.33 of the July 2016 ES remain valid, and are supplemented by the following confirmation of what constitutes the Environmental Statement in this case:
- Original Environmental Statement (July 2016) and technical appendices (**Addendum Technical Appendix A1.0 and A1.1**)
 - This Environmental Statement Addendum (ESA) (October 2017), Addendum Technical Appendices and Non-technical summary.

Approach to the Technical Assessment

- A2.17 The approach to the technical assessment remains valid as set out in paragraphs 2.11 to 2.21 of the July 2016 ES. Where the approach differs, this is clearly set out in the technical chapter.

Level of Significance

A2.18 Paragraphs 2.22 to 2.32 of the July 2016 ES remains valid. Where the approach differs, this is clearly set out in the ESA technical chapter.

Assumptions and Limitations

A2.19 Paragraph 2.33 of the July 2016 ES remains valid.

A3. Description of the Development Site

- A3.1 This Chapter of the July 2016 ES (**Addendum Technical Appendix A1.0**) presents a brief description of the location of the development site and its specific characteristics. There have been no significant changes to the site or its context since the July 2016 ES was prepared. **Chapter 3 of the July 2016 ES** remains **valid**.

A4. Proposed Development

A4.1 This ESA Chapter replaces Chapter 4 of the July 2016 ES.

A4.2 The description of development has been amended to remove reference to the residential development, as follows:

Re-development of former waste water treatment works following demolition of existing structures to provide employment uses (Use Classes B1(c), B2 and B8) on land off Cliff Hollins Lane and provision of a school car park for Woodlands Primary School on land off Mill Carr Hill Road (outline application – all matters reserved).

A4.3 The red line area for the site remains as set out in the July 2016 ES, as follows:

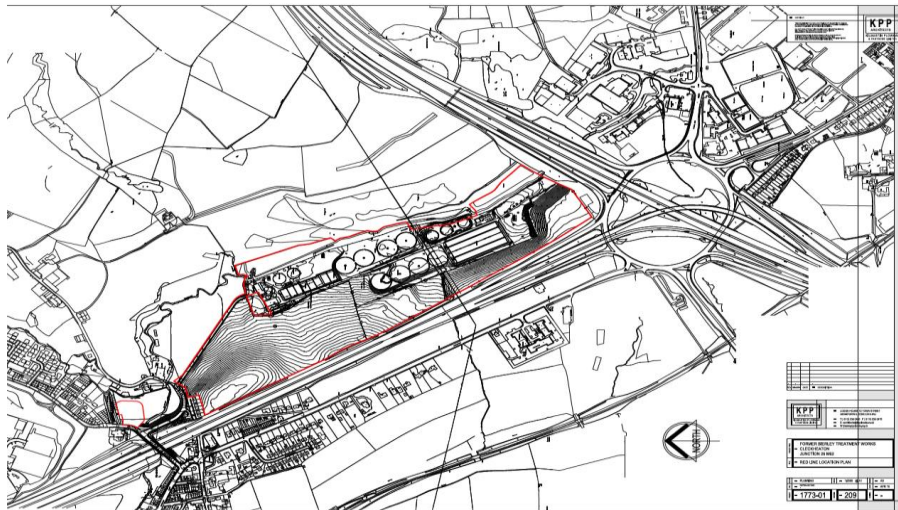


Figure A4.0: Site Area

A4.4 Details of the programme of works are included within this Chapter as far as they are known as this stage. Detailed consideration of effects during the construction and proposed mitigation measures are provided in each relevant Chapter of the ES.

A4.5 This Chapter should be read in conjunction with the application drawings including Parameters Plan and Plateaus Plan, Site Sections, the Transport Assessment and numerous technical reports provided as technical appendices. All matters other than means of access are reserved for subsequent approval and hence much of the detail will come forward at a later stage.

Development Parameters

A4.6 It is standard practice with outline planning applications to establish a set of development parameters to both guide the development and to aid the assessment of effects. This approach ensures that the future development of the site at the reserved matters stage does not exceed what has been assessed in the ESA 2017.

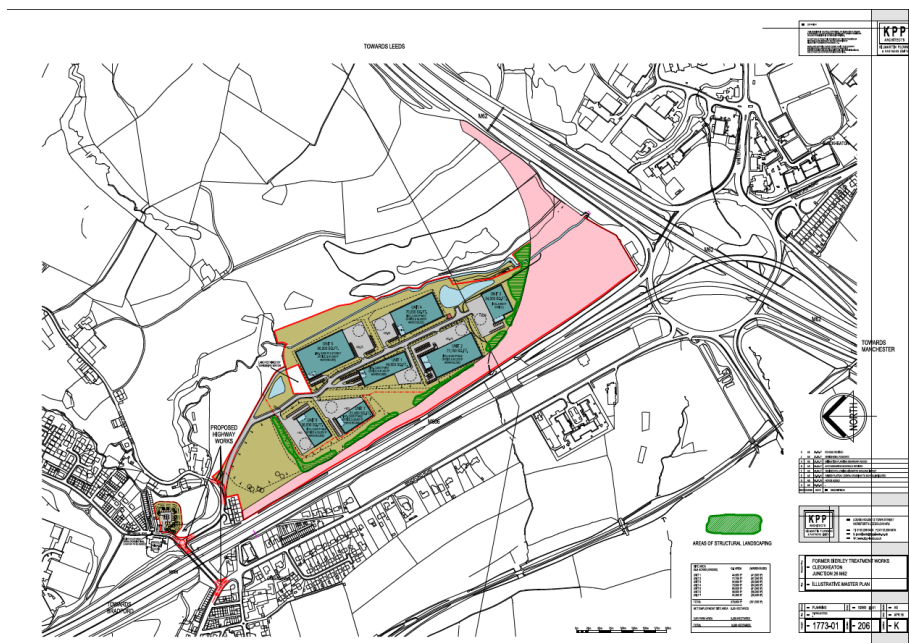


Figure A4.2: Illustrative masterplan

A4.9 Following discussions with Highways England a more extensive area of land to accommodate possible improvements to the Chainbar roundabout (Junction 26 M62) may be required. The Revised Parameters Plan (**Figure A4.1**) ensures that the developable area takes this possible alignment into account by keeping this part of the site free from development.

Distribution of Land uses

A4.10 The distribution of uses is shown on Parameters Plan **Figure A4.1**. The following table, **Table 4.1**, sets out the development parameters for the original proposals and the revised Proposed Development. This enables a comparison to be made between the largest scale of development on site (Original Proposals) and a reduced area (revised Proposed Development).

Table A4.1 Development Parameters Comparison

Use	Original Proposals (2016)			Revised Proposals (2017)		
	Area (Net)	Max Floorspace	Max Height	Area (Net)	Max Floorspace	Max Height
Employment Zone 1		14,865 sq m	18m AGL		14,865sqm	18m AGL
Employment Zone 2		11,613 sq m	18m AGL		11,696sqm	18m AGL
Employment Zone 3		11,613 sq m	18m AGL		3,158sqm	18m AGL
Total	9.94ha			7.08ha		

Residential	3.25ha	101 units	9m AGL	3.25ha	0 units	NA
School Car Park	0.356	36 spaces	-	0.356	36 spaces	-
Drainage Attenuation Ponds						
Residential area		2125m3			2125m3	
Employment area		6235m3			6235m3	

A4.11 The revised Parameter Plan amends the land use for the site to solely employment (including associated infrastructure and parking). The Proposed Development is for B2/B8 employment uses reflecting the proximity of the site to the key motorway network.

A4.12 Structural landscaping is provided on the site boundaries providing an appropriate separation distance from the motorways and other adjacent land uses. Drainage attenuation ponds are also identified, and are unchanged from the original proposals.

A4.13 The proposed car park for Woodlands CofE School is also identified on the Parameter Plan, **Figure A4.1**. This is unchanged from the original proposals.

Building heights

A4.14 The proposed maximum building heights for the industrial units in the Revised Development Proposals are the same for the original proposals, and are shown on Parameter Plan in **Figure A4.1**. Maximum building heights of 18m are set out in metres above the proposed ground level (AGL).

A4.15 The height in metres is considered as a maximum, and allows for chimney heights etc.,. It is likely that final completed storey heights would actually be below this height and there will be variety within the zones. However, for the purposes of a fully robust assessment, a maximum height is given.

Location of Access

A4.16 Full details of the means of access are to be reserved for later approval. However, the Parameters Plan (**Figure A4.1**) defines the location of the access from Cliff Hollins Lane, reflecting the existing line of the access to the former WWTW. The location of access to the new school car park will be from Mill Carr Hill Road, opposite Woodlands CofE School. This is unchanged from the original proposals.

Construction Phasing

A4.18 At this stage in the project, no detail is known on construction programme or phasing. However, for the purposes of modelling (particularly in respect of transport), it is assumed the development will be commenced in 2022, after the submission and determination of reserved matters application (s) and will be completed by 2026.

A4.19 The general approach to the construction will follow these principles:

1. Establish a site compound
2. Demolish existing structures and buildings, and stockpile the materials for reuse
3. Site remediation
4. Site regrading to create development plateaus including temporary drainage provision
5. Access road and servicing plots and advance landscaping
6. Construct buildings in line with market demand

A5. Consideration of Alternatives

A5.1 This Chapter of the July 2016 ES (**Addendum Technical Appendix A1.0 and A1.1**) sets out the need for the Proposed Development and the consideration of the main alternatives. The addendum has been prepared due to revisions being made to the proposals as a result of comments made during the consultation period.

A5.2 This chapter is prepared by Turley

A5.3 In this chapter comments are made with regard to each section of the Consideration of Alternatives chapter of the July 2016 ES in order to clarify whether the information presented remains valid, or whether the revised scheme would result in changes to the assessment.

Legislative and Policy Context

A5.4 Paragraph 5.2 of the July 2016 ES remains valid although reference to “Schedule 4, Part 1(2) and Part 2(4) of the EIA Regulations 2011” should be replaced by “Schedule 4 (2) of the EIA Regulation 2017.” [Ref 1.3]

A5.5 Paragraph 5.3 remains valid, except reference to “paragraph 4 Part II of Schedule 4” should be replaced by “Schedule 4 (2).”

Requirement and Need for Development

Employment

A5.6 Paragraphs 5.4 and 5.5 remain valid.

A5.7 Paragraph 5.6 should be updated to reflect the latest position in planning policy and associated economic strategies. The references to the Kirklees Council’s emerging Local Plan and in the bullets 2 at paragraph 5.6 should be replaced with the following:

- Kirklees Council’s emerging Local Plan Publication Draft (2016) [Ref A5.1]

Leeds City Region

A5.8 Paragraph 5.7 to 5.8, and Figure 5.1 remain valid

Kirklees Council Policy

Adopted Policy

A5.9 Paragraphs 5.9 to 5.11 remain valid.

Emerging Policy and Evidence Base

A5.10 Paragraph 5.12 remains valid.

- A5.11 Reference in paragraph 5.13 to the “new Local Plan [Ref 5.3]” should be changed to “new Local Plan (2016) [Ref A5.1]”.
- A5.12 Paragraphs 5.14 to 5.21 remain valid. The following paragraph should be added after paragraph 5.21 to provide an update on the most recent Kirklees Council Local Plan.
- A5.13 The Allocations and Designations Plan allocations within the Kirklees Councils Publication Draft Local Plan [Ref A5.1] reduces the size of the proposed employment allocation to reflect the Highways England potential land requirements. Site Allocation reference 1985a seeks to allocate 14.06ha of land at the site for employment.

Local Policy summary

- A5.14 Paragraphs 5.22 to 5.24 are valid. The following paragraph should be provided after 5.24:
- A5.15 More recently, KMBC has progressed its Local Plan further and is still seeking to allocate 14.06ha of employment land at the site. This re-iterates the on-going support for the site in contributing towards employment land provision and economic growth within the borough.
- A5.16 Paragraph 5.25 remains valid.

Market Demand

- A5.17 The Market Report prepared by Dove Haigh Philips to support the application remain valid, and therefore paragraphs 5.26 to 5.30 remains unchanged.

Need for Residential Development

- A5.18 The Proposed Development no longer includes residential development, and therefore paragraphs 5.31 to 5.37 are no longer relevant, and are deleted.

Need for Car Park Development

- A5.19 The proposed car park for Woodlands CofE School remains part of the Proposed Development, therefore paragraphs 5.38 to 5.45 remain valid.

Alternatives

- A5.20 This section of Chapter 5 considered the main alternatives considered when preparing the Proposed Development. Paragraphs 5.46 remains valid.

Do nothing Scenario

- A5.21 The implications and effects of the “do nothing scenario” are unchanged, and therefore paragraphs 5.47 to 5.50 remain valid.

Alternative Sites

- A5.22 There are no new alternative sites that should be considered, and therefore paragraphs 5.51 to 5.59 remain valid.

Committed Sites

- A5.23 There are no known significant changes to the committed sites considered in the assessment which would alter the conclusions on their appropriateness as a reasonable alternative to the Proposed Development. Paragraphs 5.60 to 5.74 remain valid.

Local Plan: Strategic Sites

- A5.24 There are no known significant changes to the Local Plan Strategic Sites considered in the assessment which would alter the conclusions on their appropriateness as a reasonable alternative to the Proposed Development. Paragraphs 5.75 to 5.88 remain valid.

Draft Local Plan: Proposed Allocations

- A5.25 There are no known significant changes to the proposed allocations considered in the assessment which would alter the conclusions on their appropriateness as a reasonable alternative to the Proposed Development. Paragraphs 5.89 to 5.96 remain valid.

Other Potential Sites

- A5.26 There are no known significant changes to the potential sites considered in the assessment which would alter the conclusions on their appropriateness as a reasonable alternative to the Proposed Development. Paragraphs 5.97 to 5.119 remain valid.

Alternative Options

- A5.27 This part of the July 2016 ES considered alternative development options within the Application Site. In terms of considering the main alternative forms of development on the Application Site paragraphs 5.120 to 5.133 remain valid.
- A5.28 Paragraph 5.134 to 5.136 considered the Proposed Development as set out in Chapter 4 of the July 2016 ES, known as Option 14. Paragraph 5.134 and 5.135 remain valid. However, paragraph 5.136 is deleted and replaced by the following:
- A5.29 In response to feedback during the planning application process, Option 14 is no longer the preferred option, and is now considered one of the alternative forms of development which has been discounted. The basis for discounting this option relates to the expected land requirement identified by Highways England for the potential improvements to the M62 Chainbar roundabout, and the removal of residential development from the Proposed Development. This Option is no longer considered viable or deliverable.
- A5.30 The following paragraphs are provided after paragraph 5.136 as follows:

Proposed Development

- A5.31 The Proposed Development scheme seeks to provide the level of employment land required to make a significant contribution towards the supply of employment land in support of Kirklees Council's Economic Strategy. The change in the viability of employment development along the M62 corridor supports an employment only scheme in this location.

A5.32 The developable area has been reduced to provide an appropriate balance between the economic growth requirements, Green Belt and potential highway improvements, whilst also ensuring any environmental effects are minimised and mitigated.

A5.33 The Proposed Development is considered to be the most viable proposal which addresses the environmental and physical constraints, and the market requirements.

References

A5.1 Kirklees Council's emerging Local Plan Publication Draft (2016)