



GERALDEVE

Planning Statement

Land off Blackmoorfoot Road and Felks Stile Road, Huddersfield

On behalf of: Empire Knight Group Ltd

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1 Introduction

1.1 This Planning Statement is prepared on behalf of Empire Knight Group Ltd (“the Applicant”) in support of an outline planning application with points of access and all other matters reserved, for the redevelopment of land off Blackmoorfoot Road and Felks Stile Road, Huddersfield.

1.2 The description of development is as follows:

“Outline application with details of points of access (matters of access, scale, layout, landscaping and appearance are reserved) for the development of up to 770 residential dwellings (Use Class C3), including up to 70 care apartments (Use Classes C2/C3) with doctors surgery of up to 350 sq m (Use Class D1); up to 500 sq m of Use Class A1/A2/A3/A4/A5/D1 floorspace (dual use), vehicular and pedestrian access points off Blackmoorfoot Road and Felks Stile Road and associated works.”

1.3 This planning application has been submitted electronically via the Planning Portal (Planning Portal reference: PP-08932792), with the following documents submitted in support of the application:

- Planning Application Form (signed and dated)
- Land Ownership Certificates (signed and dated)
- Drawing pack prepared by Planit-IE LLP:
 - PL1713-AB-005-12 – Site Location Plan (1:2000 at A1)
 - PL1713-PLA-XX-XX-DR-U-0010-S1-P04 - Indicative Masterplan
 - PL1713-AB-007-02 – Combined Parameters Plan
 - PL1713-AB-008-03 – Indicative Phasing Plan
 - PL1713-AB-013-01 – Development Area Parameter Plan
 - PL1713-AB-014-01 – Land Use Parameter Plan
 - PL1713-AB-015-01 – Access and Movement Parameter Plan
 - PL1713-AB-016-02 – Green Infrastructure Parameter Plan
 - PL1713-AB-017-01 – Building Heights Parameter Plan
- Acoustic Planning Report (July 2020) prepared by Lighthouse Acoustics
- Air Quality Impact Assessment (July 2020) prepared by Redmore Environmental
- Design and Access Statement (July 2020) prepared by Planit-IE LLP
- Ecology Assessment Addendum Note (August 2020) prepared by Tyler Grange LLP
- Ecological Assessment (March 2018) prepared by Tyler Grange LLP

- Flood Risk Assessment and Drainage Strategy (July 2020) prepared by Campbell Reith
- Health Impact Assessment (July 2020) prepared by GHEM Consulting
- Historic Environment Desk-based Assessment (July 2020) prepared by RPS
- Landscape and Visual Impact Assessment (July 2020) prepared by Planit-IE LLP
- Lighting Assessment (July 2020) prepared by Redmore Environmental
- Phase I and Phase II Geo-Environmental Site Assessment (February 2018) prepared by E3P
- Planning Statement (August 2020) prepared by Gerald Eve LLP
- Preliminary Arboricultural Impact Assessment (July 2020) prepared by Tyler Grange LLP
- Statement of Community Involvement (August 2020) prepared by UK Networks
- Transport Assessment including Travel Plan Framework (July 2020) prepared by Croft Transport Solutions
- Utility Study (February 2018) prepared by UCML Limited

1.4 This outline planning application represents the first resubmission following the refusal of planning permission for a development of a similar nature (planning reference: 2018/90748), submitted on behalf of the same Applicant and which has been submitted within 12 months of the date of the previous decision. As such, no planning application fee is due in accordance with Regulation 9 of The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012.

1.5 This Planning Statement provides a summary of the site and the development proposals before analysing the key issues surrounding how the development relates to the relevant planning policy framework.

1.6 The remainder of this Statement is set out in the following sections:

- Background and Planning History
- Site Description and Allocations
- Proposal
- Planning Policy Overview
- Updated Technical Information
- Summary

2 Background & Planning History

- 2.1 As noted in Section 1, this outline planning application represents the first resubmission of a previously refused development proposal relating to planning application reference: 2018/90748. The background to the current proposal is therefore of paramount importance to how the current planning application has been prepared and how the scheme fits with the planning policy framework, as discussed in Section 5.
- 2.2 A copy of the planning officer's report to Planning Committee is attached at **Appendix A**, for ease of reference.
- 2.3 The Applicant originally engaged with the Council in early 2017 at which time the Site was being proposed within the Council's emerging local plan as a mixed-use residential and commercial land use allocation. After lengthy discussions with officers and the submission of some initial market-led evidence regarding the prospects of commercial development being wholly unviable, the Council supported the change of the draft allocation to a housing allocation for approximately 700 dwellings. The local plan has since been adopted with the Site allocated for housing (Local Plan site reference: HS23).
- 2.4 The Applicant entered into formal pre-application discussions with the Council in October 2017, during which the general approach to urban design and the mix of land uses was broadly agreed for an outline proposal.
- 2.5 Throughout the early discussions and formal pre-application discussions, Gerald Eve made the Council aware that the Site had a number of challenges due to its topography and that the development's financial viability was likely to be challenging. As a result, the Council approached Gerald Eve in autumn 2017 to seek supporting evidence to assist its bid to the Homes and Communities Agency's (now Homes England) Housing and Infrastructure Fund, specifically the Marginal Viability Fund. The Council's bid was based on a need to improve key road junctions in the local area that would help support the delivery of several development sites, including the application Site. In supporting the Council's Planning Policy team throughout the bid process, there was recognition from Council officers of the challenging viability position for the Site.
- 2.6 Unfortunately, the Council notified Gerald Eve in February 2018 that the bid had been unsuccessful.

- 2.7 The Applicant subsequently submitted an outline planning application on 5 March 2018, for which the description of development comprised:

“Outline application with details of points of access (matters of access, scale, layout, landscaping and appearance are reserved) for the development of up to 630 residential dwellings (Use Class C3), up to 70 care apartments with doctors surgery of up to 350 sq m (Use Classes C2/C3/D1), up to 500 sq m of Use Class A1/A2/A3/A4/A5/D1 floorspace (dual use), vehicular and pedestrian access points off Blackmoorfoot Road and Felks Stile Road and associated works.”

- 2.8 As part of the application, the Applicant submitted a Financial Viability Assessment (FVA) which provided detailed evidence that the scheme would not be able to provide any affordable housing towards the Council’s policy target, nor would it be able to make a full provision of anticipated financial contributions to be secured by Section 106 agreement.
- 2.9 The Council appointed an external advisor (District Valuation Service) to review the FVA on behalf of the Council and whom agreed with the majority of evidence put forward, and in some instances the DVS suggested that the FVA was being too optimistic. The Council decided that the DVS’ response could not be supported, and officers took a lead on the process towards reaching an agreed position through the provision of further evidence and sensitivity testing.
- 2.10 The Council proposed to the Applicant that the development would be made viable and be able to afford a policy-complaint provision of affordable housing and other Section 106 contributions (e.g. education, highways, public transport etc) if the scale of development was increased to 770 units. The Council also noted that this approach would bring the development in line with the Council’s borough-wide target development density of 35 dwellings per hectare. This approach was reflected in the officer’s report to Planning Committee at **Appendix A** (paragraph 10.17).
- 2.11 The Applicant carried out some additional work but was not satisfied that the viability position improved as a result of the increased density. Moreover, the increased density was likely to reduce the place-making approach that had been adopted for parts of the site, particularly towards the northern boundary, where larger and lower density dwellings would potentially drive value by benefitting from views across the Colne Valley.
- 2.12 Ultimately, the Council decided to present the planning application to Members of the Planning Committee with a recommendation to refuse planning permission as officers

deemed there to have been insufficient progress towards an acceptable resolution. The Applicant made officers aware prior to the Planning Committee meeting that it did not wish the application to be determined and requested that more time be allowed to prepare further evidence in order to reach an agreeable position – the request was denied both by officers and Members of the Planning Committee.

2.13 As such, planning permission was refused on 14 August 2019 based on the following reason:

“The Kirklees Spatial Strategy detailed in the Kirklees Local Plan seeks to provide new homes which meet the needs of the community. There is an identified and justified need for the provision of affordable housing within Kirklees which this scheme fails to sufficiently provide for. Policy LP5 requires masterplans to make efficient use of land through appropriate densities and also provide a mix of houses that address the range of local needs. The indicative masterplan does not achieve these policy outcomes. Policy LP7 of the Kirklees Local Plan requires the effective use of land and the new developments should achieve a density of 35 per ha where appropriate. This application does not achieve this level of density and as a consequence also fails to deliver the required contributions towards affordable housing or education provision, thus in addition to being contrary to Policy LP7 it is also contrary to Policies LP4, LP5 and LP11 of the Kirklees Local Plan.”

2.14 It is noteworthy that the application was only refused on the grounds of viability and density and that no other objections were raised on technical grounds or by members of the public to the principle of the development. This is confirmed within Sections 7 and 8 and summarised at paragraph 11.2 of the Committee Report at **Appendix A**.

2.15 The Applicant has since considered its options and has decided to reapply for planning permission incorporating the higher density of development proposed by the Council (i.e. 35 dwellings per hectare, totalling up to 770 units (further detail regarding the Proposal is provided in Section 4), and proposes to include 20% of the market dwellings as affordable homes.

2.16 The Applicant remains of the opinion that the full provision of affordable homes in line with policy is commercially unviable but is keen to secure an outline planning permission in order to explore its options further in terms of developing the site and/or exploring potential market interest.

Environmental Impact Assessment – Screening

- 2.17 Whether a proposal is considered to constitute Environmental Impact Assessment (EIA) development is governed by the schedules within the Town and Country Planning (Environmental Impact Assessment) Regulations (2017) (“the EIA Regulations”). EIA is mandatory for projects appearing in Schedule 1 and is required for projects appearing in Schedule 2 if they are likely to give rise to significant effects on the environment.
- 2.18 In order to assess whether a Schedule 2 project is likely to give rise to significant effects, it must be screened if:
- a) it is located within a “sensitive area” (defined as Areas of Special Scientific Interest, Areas of Outstanding Natural Beauty, National Parks, World Heritage Sites, Special Protection Areas and Special Areas of Conservation); or
 - b) if it exceeds the applicable thresholds specified in the Schedule (which predominately relate to the scale of the development).
- 2.19 The proposed development does not appear within the list of developments falling within Schedule 1 and the site is not located within a ‘sensitive area’ as defined by Schedule 2. The development does, however, fall under the definition of ‘Urban Development Projects’, as set out under Class 10(b) of Schedule 2, and exceeds the applicable thresholds (i.e. it is over 150 dwellings, or the site area is greater than 5 ha). As such, the proposed development needed to be screened to assess whether it is likely to give rise to significant effects on the environment.
- 2.20 A Screening Request was previously submitted to the Council on the 15 August 2017 in respect of the original application. This sought confirmation that the character, location and potential impacts of the proposed development would not cause environmental effects that would be significant in terms of the EIA Regulations. The Council adopted its Screening Opinion from the Council was received on the 5 September 2017, which confirmed that the proposal was not considered to be EIA development.
- 2.21 As the current Proposal includes a material uplift in scale of development, it was considered necessary to submit a further request for the Council’s Screening Opinion to ensure correct procedure was followed. The Council provided its draft Screening Opinion in advance of the application being submitted, indicating that the Proposal was not considered to be EIA development. A copy of the draft Opinion is attached at **Appendix B**, and it is expected that the formal response will be received shortly after submission of the planning application.

Public Engagement

- 2.22 As noted above, the previous planning application attracted no objections and only one letter of representation from a member of the public (querying the likely position and layout of road works to Blackmoorfoot Road), having completed a comprehensive programme of pre-application engagement comprising two public exhibitions.
- 2.23 In line with best practice, the Applicant has carried out a shorter public engagement exercise prior to the submission of this planning application. This included:
- An online stakeholder preview session for local councillors and Member of Parliament with project team members in attendance;
 - Preparation of a dedicated consultation website including survey and feedback form;
 - A press release circulated in the Huddersfield Examiner advertising the consultation website; and
 - A mailshot of leaflets to more than 1,200 homes and local businesses advertising the consultation website, but also including details of an email and Freepost address and information telephone line.
- 2.24 Further information on the public engagement, including responses to the public consultation events, is set out within the supporting Statement of Community Involvement submitted in support of this planning application.

3 Site Description and Allocations

Site Description

- 3.1 The site measures approximately 29 hectares (ha) and is bound by open fields to the north, residential dwellings of Crosland Hill to the east, Blackmoorfoot Road to the south and Felks Stile Road to the west. A Site Location Plan is attached at **Appendix C**, which illustrates the extent and location of both the proposed application site (red line) and the Applicant's wider land ownership (blue line), an extract of which is also provided below for ease:

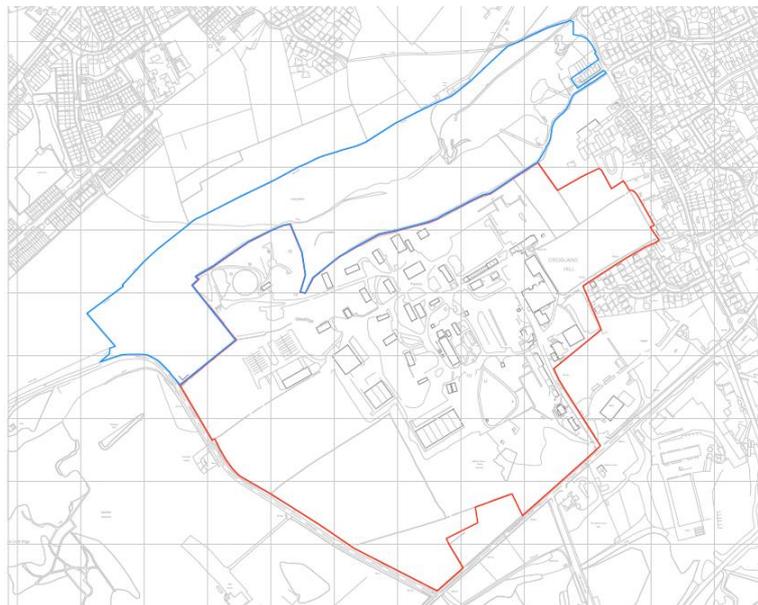


Figure 1: Site Location Plan

- 3.2 The site is considered to comprise three distinct areas and detail on each is set out below.
- 3.3 The first area comprises the existing firework storage and distribution compound, which measures approximately 17 ha. This area is currently occupied by Black Cat Fireworks Ltd (BCF) and includes grass and scrub land, a varied mixture of office buildings, sheds, reinforced storage buildings and shipping containers linked by several access roads and parking/storage bays.
- 3.4 As this area of the site is used for the storage and distribution of fireworks, it is licensed and regulated by the Health and Safety Executive (HSE) for the purpose of the Explosives Regulations 2014 (License No. X1/411/22854). The site is also regulated by the HSE with respect to the Control of Major Accident Hazards Regulations 2015 (COMAH), with it being identified as an 'Upper Tier' establishment (ref. H1217).

- 3.5 The second main area comprises agricultural fields to the west of the fireworks site. This consists of managed grassland and agricultural fields used mainly for grazing, hay or silage. This area of the site also contains Tree Preservation Orders (TPO) on individual and groups of trees located on the south western boundary (TPO IDs: 32/90/T1, 32/90/T2, 30/92/T3 and 30/92/T4).
- 3.6 Finally, the third area of the site is located to the east, situated between the site's existing factory compound and residential dwellings of Crosland Hill. This area comprises a mix of managed grassland associated with the fireworks compound and small-scale agricultural fields used for grazing.
- 3.7 In terms of the surrounding area, this comprises: woodland and agricultural fields to the north, beyond which lies the village of Cowlersley; the village of Crosland Hill is situated to the east; a natural stone quarry, a public house and Crosland Moor Airfield are situated on the opposite side of Blackmoorfoot Road to the south; and Crosland Heath Golf Club is located immediately to the west of the site.
- 3.8 Due to natural gradients, old quarry sites and man-made platforms as part of the fireworks compound, the site has an elevated nature and a variable topography. As a general guide, there is a fall in levels of approximately 50 metres from west to east across the site, with less variation in levels from north to south.
- 3.9 The site is not situated within an area at risk of flooding, with the whole site being located within Flood Zone 1. There are no watercourses or ponds situated on or within close proximity to the site.
- 3.10 The site does not contain any designated heritage assets (e.g. Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Historic Battlefields) but the eastern edge of the site is within the setting of six listed buildings (including one Grade II* listed building and five Grade II listed buildings). The site is considered to comprise a number of non-designated heritage assets including certain agricultural fields, Thewlis Lane to the east of the site, dry-stone-wall boundaries from the circa 1850s, former quarry areas and buildings and structures associated with the fireworks compound.
- 3.11 The site abuts a number of Public Rights of Way (PRoW) footpaths. Two are accessed via Felks Stile Road to the west (ref. HUD/234/30 and HUD/234/40). These subsequently merge with PRoW ref. HUD/234/20 and PRoW ref. HUD/234/50, which run along the northern boundary of the site.

Allocations

- 3.12 The Site is allocated within the adopted Kirklees Local Plan Allocations and Designations (February 2019) for residential development of approximately 700 units – Site reference HS23. An extract of the Local Plan Policies Map is provided below, which confirms the extent of the allocation.

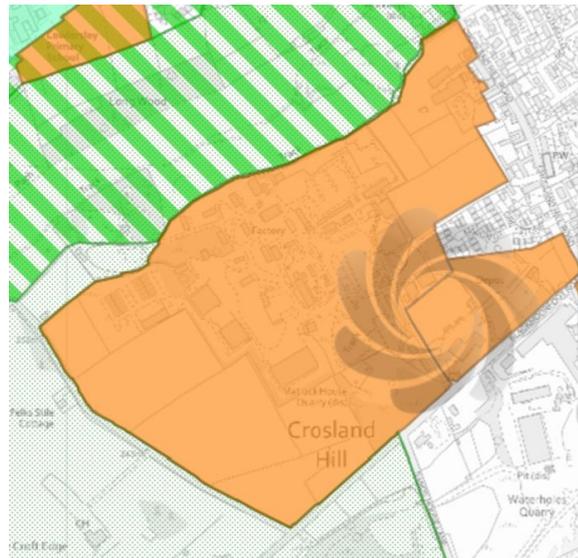


Figure 2: Extract of Local Plan Policies Map

- 3.13 For completeness, a small area of the site on the north-western boundary extends into the Green Belt (shown in light green shading on the extract above) and lies partially within the River Colne Corridor (shown in green diagonal hatching), part of the Council's Strategic Green Network. The entire site and surroundings also lie within a mineral safeguarding area in respect of sandstone.

4 The Proposal

- 4.1 Outline planning permission, with details of the proposed points of access, is sought for the following development:

“Outline application with details of points of access (matters of access, scale, layout, landscaping and appearance are reserved) for the development of up to 770 residential dwellings (Use Class C3), including up to 70 care apartments (Use Classes C2/C3) with doctors surgery of up to 350 sq m (Use Class D1); up to 500 sq m of Use Class A1/A2/A3/A4/A5/D1 floorspace (dual use), vehicular and pedestrian access points off Blackmoorfoot Road and Felks Stile Road and associated works.”

- 4.2 It should be noted that as this planning application is made in outline, with all matters except points of access reserved (i.e. details of site roads are reserved), it means that the detailed design of the scheme will be determined at the reserved matters stage of the application process. Nevertheless, the indicative masterplan identifies a number of key design parameters and demonstrates how the proposed quantum of development could fit on the site.

Residential

- 4.3 The development proposes up to a maximum of 770 residential dwellings (Use Class C3). The precise mix of house types does not form part of this application and would be confirmed as part of the reserved matters process. An indicative mix of house types has been included within the Design and Access Statement to provide an illustration of how the development could come forward.
- 4.4 The Building Heights Parameter Plan illustrates the majority of the dwellings will be 2 storeys in height, with the central area of the site providing up to 3 storeys. These storey heights tie in with the Density Parameter Plan, which illustrates that the lower density housing is situated on the edges of the site, with the density increasing towards the centre of the site.

Care Accommodation

- 4.5 A block of up to 70 care apartments is proposed in the south west corner of the application site. The block would extend to 3 storeys in height as shown on the Building Heights Parameter plan and will either take the form of age restricted housing for over 55s (Use Class C3) or extra care accommodation (Use Class C2). However, the intention remains that if market demand does not exist for the care use, the development could take the form of 70

open residential apartments or houses within the overall parameter of 770 units for the whole site. This approach is consistent with how the Council assessed the previous planning application.

- 4.6 Should the care accommodation come forward, it is proposed that the block could accommodate a doctors' surgery (Use Class D1) of up to 350 sqm. The intention is that this could serve both the care accommodation as well as the immediate community, again, subject to market demand.

Local Centre

- 4.7 As part of the original pre-application public consultation exercise that informed the previous planning application, it became apparent that access to services and facilities was a key issue for existing local residents. Such opinions have again been expressed during the pre-application public consultation exercise in the run up to submitting this current planning application. As such, a local centre is proposed within the central portion of the Site. This will comprise up to 500 sqm of flexible Use Class A1/A2/A3/A4/A5/D1 (dual use).
- 4.8 The inclusion of flexible uses allows for a variety of uses to come forward within the local centre, subject to market demand. For instance, the local centre may comprise one local convenience retail unit of 500 sqm or multiple smaller units comprising a range uses such as community, retail and local service provision.

Use Classes

- 4.9 It is noted that the Government has recently introduced a significant raft of changes to the Town and Country Planning (Use Classes) Order 1995 (as amended), which will come into effect on 1 September. As this planning application has been submitted in advance of those changes being formally implemented, it is expected that the current use classes (as referred to within the description above) would remain if planning permission is granted.

Access

- 4.10 Vehicular access into the site will be provided off Blackmoorfoot Road to the south and Felks Stile Road to the west. It is proposed that access for pedestrians and cyclists will be provided for at both of these vehicular access points, in the form of pedestrian footways, dropped kerbs and tactile paving.

- 4.11 The proposed accesses off Blackmoorfoot Road and Felks Stile Road would be priority controlled and would include a 5.5-metre-wide carriageway, 2 metre footways on either side and 10 metre corner radii.
- 4.12 To cater for the volume of traffic movements turning into the site from Blackmoorfoot Road, the proposed design incorporates a right turning lane on Blackmoorfoot Road. In order to accommodate this, the Blackmoorfoot Road carriageway along the site frontage would be widened, using the land within the Applicant's ownership.
- 4.13 As the proposal provides details of the point of access only, the internal layout of the roads and footways is reserved for determination at the relevant reserved matters stage. Notwithstanding this, the Access and Movement Parameter Plan demonstrates how a legible network of routes across the site, complemented by additional footpaths and cycle routes through the open spaces, could be achieved through a central spine road, secondary streets, tertiary lanes and mews streets.

Open Space

- 4.14 The indicative Masterplan illustrates how the scheme could provide up to 7.8 ha of open space within the site. This comprises a series of different open space areas, as set out below:
- **Arrival spaces** - two gateway spaces are provided, one at the Felks Stile Road entrance to the site and one at the Blackmoorfoot Road entrance. The latter utilises the presence of the existing Sands House pub to create a 'village green' character.
 - **Natural play area** - an area for natural play is proposed within the former fireworks testing area to the north of the site. This could include timber play structures, trim trail equipment or rope swings along with seating opportunities and picnic areas.
 - **Green links** - two key green links are proposed: one connecting the arrival space off Blackmoorfoot Road to the natural play area (creating a north/south connection) and one connecting the care accommodation to the Green Belt area to north and its existing footpaths (creating a west/east connection). The green links provide opportunities for pedestrian and cycle movement, informal play, enhanced biodiversity and sustainable urban drainage features.
 - **Landscape edges** - to both the northern and western boundaries, a landscaped edge is introduced featuring clusters of tree planting and minimum offset distances. Additional buffer planting is also proposed along the boundary between Mason Court and the proposed development.

- **Pocket parks** - a series of pocket parks are dotted throughout the proposed development. Providing easily accessible green space, these areas create opportunities for informal play and recreation whilst also adding character and interest to the neighbourhood. This includes the existing field within the eastern area of the site in order to prevent the proposed development merging with the existing properties along Crosland Hill Road and to protect the nearby heritage assets.

4.15 Whilst not formally forming part of the development proposals, there is also the potential for the area of Green Belt land to the north of the site (which is within the Applicant's ownership) to be enhanced in the future. This could incorporate additional planting and habitat creation, seating, improvements to footpaths, signage and wayfinding.

Planning Obligations

4.16 During the previous planning application, a number of potential planning obligations were discussed with the Council in the context of satisfying the relevant tests as set out under Regulation 122 of the Community Infrastructure Levy Regulations (2010). Such planning obligations would need to be secured by way of a legal agreement in accordance with Section 106 of the Town and Country Planning Act (1990), as amended.

4.17 At the time of taking its decision, the Council had indicated that certain financial contributions would be required in respect of:

- Off-site highways improvements
- Education provision
- Affordable housing
- Provision and management of open space on-site
- Metrocard passes
- New bus shelter on Blackmoorfoot Road

4.18 The Council noted that a proposed subsidy towards bus services in the locality would not be required, as confirmed at paragraph 10.15 of the planning officer's report to Planning Committee (**Appendix A**).

4.19 It is envisaged that the likely planning obligations for this current planning application will be similar in scale and kind to those indicated above, subject to responses received from the various statutory consultees.

5 Planning Policy Overview

5.1 This Section sets out a brief summary of the relevant local planning policy framework, and particularly those policies that formed the basis on which planning permission was previously refused. As no other objections or conflicts with local or national policy were raised during the previous application, it is not considered necessary to complete a detailed review within this planning statement.

The Development Plan

5.2 Section 38(6) of the Planning and Compulsory Purchase Act (2004) indicates that planning applications must be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

5.3 In this instance the relevant documents of the Development Plan comprise the:

- Kirklees Local Plan Strategy and Policies (February 2019)
- Kirklees Local Plan Allocations and designations (February 2019)

5.4 The following development plan policies are considered to be relevant for decision-making purposes:

- LP1 Presumption in Favour of Sustainable Development
- LP2 Place Shaping
- LP3 Location of New Development
- LP4 Providing Infrastructure
- LP5 Masterplanning Sites
- LP7 Efficient and Effective Use of Land and Buildings
- LP11 Housing Mix and Affordable Housing
- LP13 Town Centre Uses
- LP20 Sustainable Travel
- LP21 Highways and Access
- LP22 Parking
- LP24 Design
- LP27 Flood Risk
- LP28 Drainage
- LP30 Biodiversity and Geodiversity
- LP31 Strategic Green Infrastructure Network

- LP32 Landscape
- LP33 Trees
- LP34 Conserving and Enhancing the Water Environment
- LP35 Historic Environment
- LP47 Healthy, Active and Safe Lifestyles
- LP48 Community Facilities and Services
- LP49 Educational and Health Care Needs
- LP51 Protection and Improvement of Local Air Quality
- LP53 Contaminated and Unstable Land
- LP63 New Open Space
- Site Allocation HS23

5.5 As noted earlier within this Statement, the previous planning application was determined following adoption of the Council's development plan and there were no objections or policy conflicts identified other than those used for determining that planning permission be refused. In consideration of how the current proposals address those specific policies, the following assessment is provided:

5.6 Policy LP4 requires that adequate provision of infrastructure is incorporated into major planning applications to make development proposals acceptable in planning terms. The previous application was considered to provide inadequate financial support for local education to support new school places. It is now intended to provide adequate financial contribution by way of Section 106 agreement as part of this current planning application, subject to discussions with the local education authority.

5.7 Policy LP5 relates to the masterplanning of major development sites, identifying numerous criteria to be satisfied. As the scheme is submitted in outline, much of the detail will be reserved for later determination; however, the proposals broadly accord with the masterplanning principles set out in policy. We understand that the reason Policy LP5 was identified as a basis for refusing planning permission related primarily to the development's previous density (i.e. Policy LP5(c)), which has now been increased at the request of the Council to 35 dwellings per hectare.

5.8 Policy LP7 also relates specifically to development density, setting a borough-wide target of 35 dwellings per hectare. The current proposals for 770 units accord with this density satisfying the requirements of LP7, regardless of the site-specific allocation (HS23) providing a lower indicative capacity.

- 5.9 Policy LP11 was previously used as a basis for refusing planning permission due to a lower provision of affordable housing being proposed than the target requirement of 20%. As noted, in Section 2, the Applicant remains of the view that the full provision of affordable housing is likely to render the site unviable; however, the Council made its position clear that it was unwilling to accept a lower provision even where evidence of financial viability had been submitted in accordance with Policy LP11. As such, the Applicant now proposes a full 20% provision of affordable housing (based on the final number of market dwellings to be delivered) in order to satisfy this policy requirement.
- 5.10 As there were no other policies or supplementary planning documents used as a basis for refusing planning permission and no other significant changes in local planning policy have occurred since the previous planning decision was taken, it is considered that the previous reasons for refusing planning permission have now been addressed by the revised Proposal.
- 5.11 In addition to responding to the previous reasons for refusal, it is noteworthy that the site's policy allocation (HS23) indicates that the majority of homes would be delivered during the Plan period, making a significant contribution to the housing trajectory. Due to the delays experienced during the planning application process, the delivery of the Site will also be delayed, although it is still expected that a majority of the homes could still be delivered within the Plan period to support the Council's target housing requirement.

6 Updated Technical Information

- 6.1 As the previous planning application was submitted in March 2018, it has been necessary to update several of the technical supporting documents to ensure the supporting evidence remains robust. This section provides a brief overview of the work undertaken and any significant changes to the findings previously presented to the Council during the last planning application.

Drainage

- 6.2 The drainage strategy has been adjusted and updated to reflect the increased density on site. Further to the advice received from the Council and Lead Local Flood Authority (LLFA) during the previous planning application, the Applicant commissioned infiltration testing in several locations across the Site in order to improve the potential drainage solution/options for the site – infiltration had previously been discounted as a viable primary solution due to ground conditions. The testing results concluded that 4 out of the 5 locations tested proved suitable for infiltration, and the drainage strategy has therefore been adjusted to incorporate soakaway where possible.
- 6.3 Updated consultation has been carried out with Yorkshire Water in order to confirm the surface water runoff rates, as follows:

“discharge to Crosland Hill Road at a rate not exceeding 27 litres/second and to Blackmoorfoot Road at a rate not exceeding 61 litres/second.”

- 6.4 In addition, the SUDs features have been designed to attenuate surface water runoff up to the 1 in 100-year storm event plus an allowance of 30% for climate change.
- 6.5 Overall, the drainage solution is considered to be an efficient and safe method of disposing of surface water without increasing the risk of flood further down the system towards Huddersfield town centre.

Transport

- 6.6 The previous Transport Assessment (TA) has been reviewed and a new TA has been submitted with this planning application. The TA is based on the methodologies agreed with the Council’s highways officers during the determination of the previous planning application.

6.7 The entire TA has had to be revised/updated due to the previous document being completed in February 2018. However, the main changes to the TA are within the traffic impact analysis which has been amended to reflect the increased maximum number of residential units i.e. 700 to 770 units. This has resulted in all of the junctions (8 in total) having to be reassessed. Given the increase in units on the site, this has resulted in increased levels of development traffic at the junctions on the network. However, the results of the analysis have not materially changed from those contained within the previously submitted TA, a summary of the key findings of the traffic impact analysis are provided below:

- The proposed site access junctions off Blackmoorfoot Road and Felks Stile Road have been designed to accord with highway design standards and will have sufficient capacity to accommodate the proposed development traffic.
- The proposed development will have a negligible impact at the Blackmoorfoot Road/Park Road/Park West signal-controlled junction.
- The proposed development will have a negligible impact at the A62 Manchester Road/Blackmoorfoot Road/Birkhouse Lane signal-controlled junction even based on the robust assumptions contained within the analysis.
- Kirklees Council are proposing improvements at the A62 Manchester Road/St. Thomas Road/Waterside and A62 Manchester Road/Longroyd Lane Signal Controlled Junction as part of the emerging Local Plan. Discussions will be held with the Council's highways officers to discuss the status of this improvement scheme and whether any detailed modelling work is required.
- The proposed development will have a negligible impact at the A616 Lockwood Road/B6108 Meltham Road/Swan Lane/Bridge Street signal-controlled junction. Notwithstanding this, the Council is proposing to provide an improvement scheme at the junction as part of the Local Plan.

6.8 It is therefore concluded that the development proposals will result in a minimal impact with improvements and can be accommodated on the local highway network.

Ecology

6.9 Due to the period of time that has elapsed since the previous application (i.e. greater than 2 years), Natural England's standing advice is to update protected species and habitat surveys in order to record any changes that may have occurred and that might subsequently constrain

development proposals. Discussions were held prior to the submission of this Outline application between the Applicant's ecology advisor, Tyler Grange LLP, and the Council's ecologist in order to agree the scope of work required to support the submission. It was agreed that the following surveys be carried out:

- Updated Phase 1 site walkover survey
- Updated badger survey
- External bat inspection survey

- 6.10 In summarising the finding, Tyler Grange has prepared an addendum note that should be read in conjunction with the previous ecological assessment (March 2018) that was submitted with the previous planning application – for ease of reference, the previous report has been re-submitted with this current application.
- 6.11 The walkover survey did not result in any new or unexpected findings when compared to the previous application, noting that the habitats remain unchanged since the 2018 report.
- 6.12 The updated badger survey concluded that the presence of a main sett remains on Site as well as other locations of potential badger activity. In accordance with the Council's previous advice and in line with best practice, further monitoring work is underway and a separate confidential report will be submitted to the Council in due course.
- 6.13 The external bat inspection concluded that no significant changes had occurred since the original surveys were carried out as part of the previous planning application.
- 6.14 Overall, the Site's biodiversity has not materially changed since the original planning application and it is expected that standard planning conditions could be used to control the reserved matters and construction phases accordingly.
- 6.15 The Government is currently in the process of bringing forward the Environment Bill, which is expected to be enacted shortly. As part of the new legislation, all proposed developments will be required to provide net gains in biodiversity amounting to 10% greater than the existing on-site provision, a significant requirement over and above the current target within NPPF of achieving any 'measurable net gains' (paragraph 175 of the NPPF). Whilst the legislation is yet to be formally published, it is anticipated that the law will be changed in advance of reserved matters applications and biodiversity net gain should therefore be factored in at the outline stage.

- 6.16 Early discussions with the Council indicate that the application should provide an outline strategy for achieving a net gain of 10%, which can then be assessed in detail as reserved matters applications are brought forward.
- 6.17 Tyler Grange has prepared the submitted headline calculations following the DEFRA Metric 2.0, as required by the Environment Bill. The calculations can be summarised as follows:
- Baseline on-site score = 91.70 (habitat units)
 - Post-intervention on site score = 94.54 (habitat units)
 - Total percentage net change = 3.01%
- 6.18 The headline calculations confirm that a measurable net gain is achievable on site; however, further gains may be required in order to meet the forthcoming 10% target. In setting out some options for the Site, Tyler Grange notes that opportunities exist to alter certain habitats, such as amenity grassland, to a higher distinctiveness habitat type which is likely to significantly improve the score; however, this is heavily dependent on the final detailed design of the development. An alternative option would be to use an area of the Applicant's wider land ownership to the north of the Site, which lies within the Council's Strategic Green Network. Improving habitats and potentially introducing a management regime is also likely to help achieve the target net gains if unachievable on site.
- 6.19 Overall, the Applicant is satisfied that the objectives of national policy and emerging legislation in respect of achieving a net gain in biodiversity can be satisfied.

Arboriculture

- 6.20 An updated tree quality survey and arboricultural implications assessment has been submitted with this current planning application due to the period of time that has elapsed since the previous report was prepared in February 2018.
- 6.21 The survey noted that the tree stock on site had not changed significantly since the previous survey, with the higher quality and more mature stock generally limited to the Site's boundaries, with low/medium quality naturalised trees within the Site. In tandem with the ecology work, the assessment highlights the need to bring forward an appropriate landscape and replanting strategy at the reserved matters stage and which would include an arboricultural method statement, to be secured by way of planning condition(s).

Other Technical Matters

6.22 In brief, the list below provides a summary of the other technical reports submitted with the application which have either been updated or re-submitted as follows:

- **Landscape and visual impact assessment** – the assessment has been updated to reflect the slight changes to the layout and landscape strategy; however, the visual impact of the development has not changed as the development envelope has not changed.
- **Statement of community engagement** – a new statement has been submitted to review the pre-application consultation activities completed, summarising the feedback from received from members of the public and key stakeholders.
- **Geo-environmental assessment** – the previously-submitted report remains valid and has not been updated.
- **Noise assessment** – an updated report has been submitted with this application reflecting the changes to the masterplan. The report concludes that there is no greater impact on neighbouring properties than the previous application, nor is there any change in the results regarding proposed residential dwellings.
- **Air quality assessment** - an updated report has been submitted with this application reflect the changes to the masterplan. The report concludes that there is no material change to the impacts on air quality as a result of the revised proposals.
- **Light impact assessment** - an updated report has been submitted with this application reflect the changes to the masterplan. The report concludes that there is no material change to the impacts caused by lighting as a result of the revised proposals.
- **Historic Environment** – an updated desk-based assessment has been carried out to consider the impacts of the amended development proposal on the historic environment. There are no material changes to the relevant designated and non-designated heritage assets that have been assessed, and the proposed mitigation is considered to remain acceptable.
- **Utility statement** – the report remains valid for information purposes and has not been updated since the previous application. This can be updated prior to the submission of the first reserved matters application(s), if necessary.
- **Health impact assessment** - an updated report has been submitted with this application reflect the changes to the masterplan.

6.23 In summary, the updated work confirms that all technical matters are in good order and that the Proposal is acceptable in planning terms.

7 Summary

- 7.1 This Planning Statement is prepared on behalf of Empire Knight Group Ltd. in support of an outline planning application, with all matters other than the points of access reserved, for the redevelopment of land off Blackmoorfoot Road and Felks Stile Road, Huddersfield.
- 7.2 The proposed development represents a resubmission of a previously refused outline development scheme for up to 700 residential units, amongst other uses. This current outline planning application comprises up to 770 residential units, with the opportunity to include care accommodation (up to 70 apartments) and other small-scale non-residential uses.
- 7.3 The submitted indicative masterplan illustrates how the form of such development could take place whilst the submitted parameter plans provide further detail to guide future reserved matters applications.
- 7.4 The previous planning application (reference: 2018/90748) was refused planning permission on the basis of two main reasons: first, the lack of affordable housing and insufficient planning obligations; and second, the development density being too low (albeit in line with the site-specific policy target of circa 700 homes).
- 7.5 The Applicant currently proposes a development scheme that includes 20% affordable housing on the basis of the final number of market dwellings to be provided on Site (i.e. excluding any care provision that comes forward). Further, the Applicant aims to provide sufficient financial planning obligations to make the development acceptable in planning terms and in line with previous discussions with the Council.
- 7.6 It is considered that the previous reasons for refusal have been adequately addressed by the Proposal and the development accords with the development plan overall. Further, there are no other material considerations that would indicate that planning permission should be withheld, and it is therefore considered that planning permission should be granted without delay in accordance with paragraph 11(c) of the National Planning Policy Framework.

APPENDIX A

Planning Officer's Report to Planning Committee (planning reference: 2018/60/90748/W)

Report of the Head of Development and Master Planning

STRATEGIC PLANNING COMMITTEE

Date: 01-Aug-2019

Subject: Planning Application 2018/90748 Outline application for the development of up to 630 residential dwellings (Use Class C3), up to 70 care apartments with doctors surgery of up to 350 sq m (Use Classes C2/C3/D1), up to 500 sq m of Use Class A1/A2/A3/A4/A5/D1 floorspace (dual use), vehicular and pedestrian access points off Blackmoorfoot Road and Felks Stile Road and associated works Land off, Blackmoorfoot Road and Felks Street, Crosland Moor, Huddersfield, HD4 7AD

APPLICANT

Empire Knight Group Ltd

DATE VALID

06-Mar-2018

TARGET DATE

05-Jun-2018

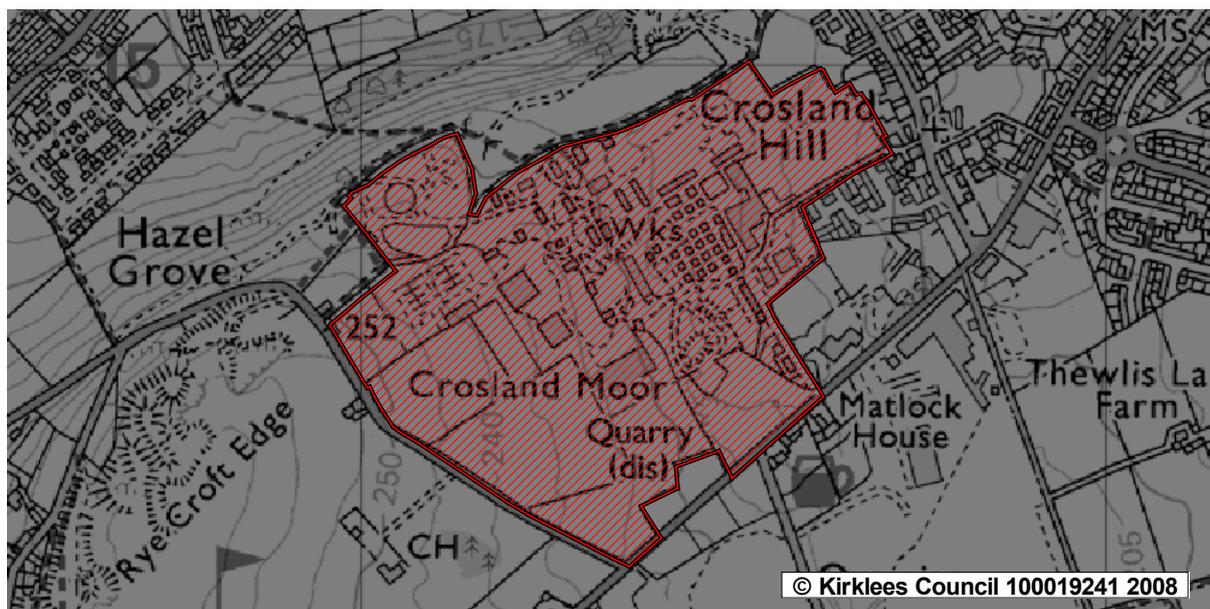
EXTENSION EXPIRY DATE

31-Mar-2019

Please click the following link for guidance notes on public speaking at planning committees, including how to pre-register your intention to speak.

<http://www.kirklees.gov.uk/beta/planning-applications/pdf/public-speaking-committee.pdf>

LOCATION PLAN



Map not to scale – for identification purposes only

**Electoral Wards Affected: Crosland Moor and Netherton.
Colne Valley**

Yes

Ward Members consulted
(referred to in report)

RECOMMENDATION:

REFUSE: The Kirklees Spatial Development Strategy detailed in the adopted Local Plan seeks to provide new homes which meet the needs of the community. There is an identified and justified need for the provision of affordable housing within Kirklees which this scheme fails to sufficiently provide for. Policy LP5 requires masterplans to make efficient use of land through appropriate densities and also to provide a mix of housing that addresses the range of local needs. The indicative masterplan does not achieve these policy outcomes. Policy LP7 of the adopted Local Plan requires the effective and efficient use of land and that new developments should achieve a density of 35 per ha where appropriate. This application does not achieve this level of density and as a consequence also fails to deliver the required contribution towards affordable housing or education provision, thus in addition to being contrary to policy LP7 is also contrary to policies LP4, LP5 and LP11 the adopted Local Plan.

1.0 INTRODUCTION:

- 1.1 This application is brought to Strategic Committee given the scale of the development, in accordance with the Councils Scheme of Delegation.
- 1.2 Members may recall that there have been 2 previous discussions regarding this site at Committee:
 - Pre-application enquiry:- 2017/920381 for demolition of the existing buildings and the erection of 695 dwellings. Members undertook a site visit. Member's comments were that they were supportive of the principle of a residential scheme across this site and of the need for the Council to deliver additional housing. There were positive comments about the opportunity to deliver innovative design and energy efficiency solutions on the site. An initial masterplan for the entire site was presented and the masterplanning process explained and the reaction to the masterplan and the process as positive. Concern at how the site would be satisfactorily accessed from the neighbouring road network was also raised. The applicants indicated that they would undertake a pre-application public consultation exercise with the local community and Ward Councillor's which took place in January 2018. At this stage there was no viability assessment to consider.

- A position statement on the current application was presented to Strategic Committee on January 3rd 2019. Progress on all aspects of the application was reported and any Member views or questions sought. The application was accompanied by a Viability Appraisal, and the level of financial contributions, towards Section 106 offered was £630,000 (based upon £1,000 pre market dwelling). This level of contribution is very substantially short of policy compliant contributions. The Committee view was that the level of contribution, which provided for no affordable housing, was not sufficient and that further negotiation was required to address this issue. At that time the applicants had agreed that they would consider a reappraisal mechanism as part of any Section 106 agreement which was a positive suggestion.

1.3 Since these committee meetings the Kirklees Local Plan has been adopted, and the site has been confirmed as an entirely residential allocation (HS23).

1.4 A viability appraisal was submitted by the applicants as part of the application and this has been assessed by the council's independent viability assessor. Significant discussions have taken place over the last year to try and bridge the gap between the applicants appraisal and the Councils opinion on what form of development could be achieved to deliver the required policy contributions and mitigation of the impacts of the development however unfortunately this has not been successful. The recommendation is to refuse planning permission for the reason above.

1.5 A summary of the viability issues is included within the main agenda report at paragraphs 10.13-10.18. The council's independent viability assessor has completed their assessment and details of the findings will be reported within a confidential paper that will be circulated to committee members prior to the committee meeting as viability issues are considered to be commercially sensitive information.

2.0 SITE AND SURROUNDINGS:

2.1 The application site comprises an area of 29.3 ha which includes the current Black Cat business and is located approx.3.5k to the south west of Huddersfield town centre. The Black Cat site contains a large number of storage sheds that are well-spaced about the site, with extensive areas of hardstanding, storage sites and roads. The site is accessed off Blackmoorfoot Road via Standard Drive, which also served a number of dwellings and the reception/ office area. The dwellings are associated with the site. The site is used for the storage of explosives, and provides employment for approximately. 20-25 people on site. The Black Cat site is bordered by fields to the south and west. To the north is an area which is within the same ownership that forms a ridged area along the southern side of the valley. There are a significant number of mature trees on the perimeter and across the site.

2.2 The sites main frontage is onto Blackmoorfoot Road, but it also has frontage onto Felkes Stile Road. On the opposite side of Felkes Stile Road to the east, is the Crosland Heath Golf Course. To the west of the site are dwellings and properties along Crosland Road, including a farm complex, which contains a Grade 2* listed building. The area to the north of the existing factory site is within the green belt, and contains a number of public rights of way.

2.3 On the previous Unitary Development Plan the site was a mixture of uses ie the existing factory site is unallocated, the neighbouring fields were allocated as Provisional Open Land, and the northern area was Green Belt. Within the Local Plan which was adopted earlier this year the site is allocated for housing (allocation HS23). The local plan now forms the development plan for Kirklees Council.

3.0 PROPOSAL:

3.1 Outline permission is sought for residential development of up to 630 dwellings and 70 no care apartments with a doctors surgery of up to 350 sq m, and small unit of up to 500sq m for a potential variety of uses ie A1(retail), A2; (professional services); A3 (food and drink); A4 (drinking establishments);A5 (hot food takeaway)and D1 (non-residential institution) – or a combination of these. The applicants have confirmed their flexibility with this mix, ie it could be up to 700 dwellings if necessary.

3.2 Other than the principle of development, access is the only matter to be considered at this stage with Appearance, Landscaping, Layout and Scale all reserved for subsequent approval and will be submitted through reserved matters applications. The point of access is taken off Blackmoorfoot Road close to the existing access point Standard Drive into the Black Cat site, and also off Felkes Stile Road.

3.3 Whilst this application is in outline the applicants have submitted an indicative layout with the application which indicates the type of development that could be achieved on the site. This plan shows 630 dwellings a mixture of detached, semi-detached and terraced across the site. In the SW corner of the site at the junction of Blackmoorfoot Road and Felkes Stile Road is a block of 70 no care apartments This is near the proposed vehicular access off Felkes Stile Road and there is an existing bus stop on that corner for trips towards Huddersfield. The applicants have confirmed that the care home facility would be removed from the scheme and replaced by approximately 70 dwellings, should the council prefer this. Officers consider that the Care facility should be removed as such facilities are normally located more centrally closer to town centres than this site, where other services are easily accessed.

3.4 The indicative scheme maintains significant green areas, including mature trees around the perimeter of the site particularly on Blackmoorfoot Road, and Felkes Stile Road, so the dwellings are actually set well back into the site. There are a number of green spaces across the site, including central green spine running SW to NE across the site. This includes a pedestrian route linking with an existing footpath at the NE corner of the site linking onto Crosland Hill Road. The green spaces include an open area on the eastern edge of the site, which acts as a form of buffer between the development and the Crosland Hill Farm listed buildings.

3.5 To the north, the area of Green belt containing a number of footpaths is retained free of development, with footpath connections linking into the site. An area towards the NW boundary is indicated as an area for “natural play”.

3.6 Blackmoorfoot Road, is flanked by two areas of open land and retained trees, and just off that access the proposed 350 sq m. mixed use unit would be located quite close to the main access.

4.0 RELEVANT PLANNING HISTORY (including enforcement history):

- 4.1 2017/20381. A pre- application enquiry was submitted for the use of this site for up to 700 dwellings, with access taken off Blackmoorfoot Road and Felkes Stile Road, and a 500 sq m retail unit in the SE corner of the site.
- 4.2 This was considered by the Strategic Committee at their meeting on 11/1/18. The Committee also undertook a site visit.

5.0 HISTORY OF NEGOTIATIONS (including revisions to the scheme):

- 5.1 This proposal was the subject of a pre- application enquiry 2017/20381 that was considered at the Strategic Planning Committee on 11/1/18. The proposal for up to 700 additional dwellings was generally well received, and it was acknowledged that the scheme would make a significant and welcome contribution towards the Councils housing supply.
- 5.2 Concerns were raised that the access point to the site from Blackmoorfoot Road would need to be justified and that the strategic network be able to cope with the additional traffic, and that other commitments nearby be included and taken account of in any submission.
- 5.3 Extensive negotiation has taken place between the applicants and Highways Services on the adequacy of the strategic network and any mitigation that may be deliverable. (This is reported in the Highways section of the assessment).
- 5.4 Negotiations have taken place regarding the drainage solution on the site, and this has been satisfactorily resolved and can be appropriately conditioned.
- 5.5 With the application (unlike the pre- application submission) the applicants submitted a viability appraisal, indicating that the site wasn't viable with Section 106 contributions and only made provision of £630,000 for all contributions. There have been discussions and meeting regarding this with the developers and external bodies eg Homes England, to try and narrow what is an enormous gap between the applicant's offer and policy compliant contributions.

6.0 PLANNING POLICY:

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The Statutory Development Plan for Kirklees is the Kirklees Local Plan (adopted 27th February 2019).

Site Designation

- 6.1 The Local Plan allocation is for housing (HS23) the indicative capacity for this site is shown as 684 dwellings with the potential for a further 16 beyond the plan period. Notwithstanding this indicative capacity policy LP7 of the Local Plan seeks to promote efficient and effective use of land and identifies an appropriate density of 35 per ha.
- LP3 Location of new development
 - LP5 Master planning of sites
 - LP7 Efficient use of land and buildings
 - LP8 Safeguarding employment land and premises

- LP9 Supporting skilled and flexible communities and workforce
- LP11 Housing mix and affordable housing
- LP13 Town Centre Uses
- LP20 Sustainable travel
- LP21 Highways safety and access
- LP22 Parking
- LP24 Design
- LP27 Flood Risk
- LP28 Drainage
- LP30 Biodiversity and geodiversity
- LP32 Landscape
- LP33 Trees
- LP38 Minerals safeguarding
- LP49 Education and Health care needs
- LP51 Protection and improvement of local air quality
- LP53 Contaminated and unstable land
- LP63 New Open Space

National Planning Policy Framework.

6.2.

- Part 2. Achieving sustainable development
- Part 5. Delivering a sufficient supply of homes
- Part 8 Promoting healthy and safe communities
- Part 9 Promoting sustainable transport
- Part 11 Making efficient use of land
- Part 12 Achieving well designed spaces
- Part 13 Protecting green belt land
- Part 14 Meeting the challenge of climate change, flooding and coastal change
- Part 15 Conserving and enhancing the natural environment
- Part 16 Conserving and enhancing the historic environment

6.3 Planning Policy Guidance updated 22/7/19 “Supporting more effective use of land.”

7.0 PUBLIC/LOCAL RESPONSE:

7.1 This application has been publicised by site notices and neighbour letters, and it has been advertised as a departure from the UDP.

7.2 One letter of representation has been received, this sought clarification of the relationship between the main access to the site off Blackmoorfoot Road, and the existing access for a dwelling on the opposite side of the road.

7.3 The Council for the Preservation of Rural England- Raise no objection in principle to the ultimate use of the site for residential or mixed use

8.0 CONSULTATION RESPONSES:

8.1 Statutory:

The Coal Authority- No objections

The Environment Agency- No objections

KC Lead Local Flood Authority- Support the outline application subject to the imposition of conditions.

KC Highways- No objections subject to conditions and appropriate contributions towards junction improvements further down the road network.

Historic England- Do not offer any comments. Recommend the Councils own specialists team give advice on this matter

8.2 **Non-statutory:**

KC Education Service- A financial contribution of £1,611,697 would be required in this case.

Yorkshire Water Authority- Recommend conditions if approved.

KC Strategic Housing- There is a demonstrable need for affordable housing in the area. The Councils interim affordable housing policy seeks 20% of numbers of units. The preferred tenure split is 55% social rental and 45% intermediate. This housing should be provided on the site. There is a need for Extra Care units within the district and this element is supported in principle.

KC Environmental Health- Recommend conditions in the event of an approval covering:-Noise attenuation; decontamination/ remediation; air quality; and lighting.

KC Trees- No objections to the outline or principle of the use. Any Reserved matters should make provision of new trees as well as retaining the best of those that already exist.

KC Environment Unit- No objections in principle, but recommend conditions to ensure the potential for bio diversity enhancement across the site is ensured with an ecological masterplan and framework condition.

KC Business and Economy- Support the scheme, and the economic opportunities it provides during construction for the local economy.

Police Architectural Liaison Officer- No objections to the principle of the development, which is still only at outline stage. Any reserved matters submission should take account of designing out crime measures. Request that they are re notified

9.0 **MAIN ISSUES**

- Principle of development and policy
- Highways Issues
- Urban design and heritage issues
- Landscape/ Biodiversity Issues
- Drainage Issues
- Environmental Issues (Decontamination/remediation; air quality; noise; lighting)

10.0 APPRAISAL

Principle of development and policy

- 10.1 Following the adoption of the Kirklees Local Plan, this site is allocated for housing (HS23).
- 10.2 Currently a substantial portion of the site is occupied by a working factory, and policy LP8 of the Kirklees Local Plan seeks to safeguard employment land and premises. On the emerging local plan the site allocation was originally a mixed use (housing and business), but the amendment to a complete residential allocation was supported by the Council and was confirmed by the Inspector within the adopted plan.
- 10.3 Clearly before residential can occur this business will need to be relocated. Given the nature of the business (involving high explosives) there is a Licensing process which needs to be completed with the Health and Safety Executive, prior to the business either closing or relocating to a site with a similar licence. In view of the above, and the confirmation of the site residential allocation in the local plan, there is no justification in objecting to the proposal or the loss of the business use, in this case.
- 10.2 As such the principle of residential development of the entire allocation accords with Local Plan policy, subject to compliance with other relevant policies in the Local Plan,
- 10.5 The application contains a small unit (350 sq.m) that could be used for retail or other commercial, town centre uses). Whilst this location is out of centre, it is within a residential area and is intended to meet local needs. It is considered that the limited scale of the unit would not give rise to the level of having any significant retail impact on existing centres. There are no defined town centres within the catchment area of the community that the unit is intended to serve and therefore the proposal is compliant with Local Plan policy LP13.
- 10.6 Notwithstanding its residential allocation, the site is also within a Minerals Safeguarded Area and subject to policy LP38 of the Local Plan. This policy seeks to safeguard minerals on sites in excess of 1000sq m unless it can be demonstrated that the mineral has insufficient economic value in which case not extracting the mineral prior to development can be justified. This policy also allows for the minerals to remain, if there is an overriding need for the proposed development.
- 10.7 The site, has in parts been quarried already, and it is accepted that there is an overriding need within the district for the delivery of new housing. As such no objection is raised to this scheme with regard to policy LP38.
- 10.8 As stated earlier there is no objection in principle to the residential use, and the residential allocation has been supported within the Local Plan as a viable and deliverable site. If a site could not be demonstrated to satisfy these requirement as part of the Local Plan process alternative sites would be sought. In addition the guidance in the updated National Planning Policy Framework indicates that there should be a presumption that any scheme for housing that comes forward is viable and deliverable.

- 10.9 It is noted that the indicative capacity of the housing allocation is 700 dwellings, which the applicant has applied for in their indicative masterplan, however it is not considered that this target is a fixed position and it would be possible to achieve a greater number of dwellings on any allocated site where it is shown to be acceptable in design and mitigation. Policy LP7 seeks the efficient and effective use of land to deliver the needed housing for the community. This indicates an appropriate density of 35 per ha will be sought on housing allocation. The indicative layout fails to deliver this density, and also fails to deliver a contribution for affordable housing and education. The application of this density also accords with the latest Planning Policy Guidance - "Supporting the more effective use of land", and improves the chances of delivering a viable scheme which delivers much needed housing as well as much needed affordable housing. It should be recognised that the council has accepted residential schemes that are less than the 35 dwellings per ha but this has been when the scheme is policy compliant in terms of affordable housing and other S106 contributions and in response to local character and site considerations.
- 10.11 It is recognised that the extra care facility would assist in addressing existing shortfalls in this type of accommodation within the district however officers are concerned about the proximity of this particular location to existing services and community facilities given the needs of the occupiers. Furthermore having regard to the viability concern of the applicants which has resulted in the non-essential infrastructure provision to an enhanced bus service not being pursued the extra care scheme is not considered an appropriate development for this site.
- 10.12 Given the scale of the development, relevant policies in the Local Plan relating to affordable housing, provision of public open space and Education Contributions are all relevant.
- 10.13 Policy compliant contributions in this case would be:
- 20% affordable housing units equates to 140 (application of Vacant Building Credit is unlikely given that the buildings are still occupied/used)
 - The on-site provision and maintenance of the public open spaces shown in the indicative layout; and
 - An Education contribution of £1,611,697.
- 10.14 In addition to these contributions a contribution towards the improvement of the junction at Longroyd Bridge of £592,000 would be required, and METRO have indicated contributions of £1,075,000, would be requested this breaks down into;
- Extending the bus service for an extra 5 years £150,000 per annum ie £750,000;
 - New bus shelter £13,000; and
 - METRO cards/ passes £312,000.
- 10.15 Regarding the requests from the METRO, Officers are of the view that the need for extending the bus service and the costs of meeting this ie £750m over 5 years, has not been satisfactorily justified by METRO, the site is in a sustainable location and details of the bus and pedestrian access to the area detailed within the Highways section of this report. The Local Plan acknowledges the distinction between essential infrastructure necessary to make the development acceptable in planning terms and desirable infrastructure which would improve connectivity and sustainability of which the bus extension scheme is considered to fall into the later. The metrocard

contribution however is considered a necessary requirement of the planning application and should be sought although it is noted that if a bus extension scheme was provided the take up of metrocards might be improved.

Viability

- 10.16 The applicants have made an allowance of £1,000 per market dwelling to account for all Section 106 costs ie a total of £630,000.
- 10.17 The applicants have submitted a viability appraisal that has been independently assessed by the District Valuer, at the expense of the applicant. The District Valuer concluded that the application scheme was unviable. Further assessment has been undertaken by the council's adviser has concluded that it is feasible to achieve a policy compliant scheme on this site is capable of being fully policy compliant but would require a increase in the number of dwellings on the site. The Viability Assessment is made upon the basis of the information provided which is in a number of ways lacking and not a satisfactory basis to draw meaningful conclusions. For instance, the levels of abnormal costs across the site are extremely high, yet no specific layout is applied for, against which to develop a realistic remediation strategy and attribute an accurate cost.
- 10.18 The initial offer of £630,000 is unacceptable, and this was a matter confirmed by Members at the consideration of the Position Statement in January of year.
- 10.19 A number of different potential offers have been raised and discussed with the applicants, on a without prejudice basis, but no formal alternative offer has been tabled. As such for the purposes of this decision the original contributions of £630,000 remains the applicants position. If the applicant revise the offer this will be reported to committee in the update.
- 10.20 As such officers consider that this offer is unacceptable and consequently the development is contrary to relevant polices within the adopted Kirklees Local Plan and the guidance within the National Planning Policy Framework which states in paragraph 57 "where up to date polices have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable". The Council's up to date CIL examination evidence would support the position that allocated housing sites should be able to achieve 20% affordable housing and still maintain a developer profit within the NPPF guidance of 15-20%.
- 10.21 The applicants Viability Appraisal has been assessed in great detail and for Members information a confidential paper will be circulated to committee members prior to the committee meeting as viability issues are considered to be commercially sensitive information. This information can be discussed by the committee within a private session should committee members wish.

Highway issues

- 10.22 The application has been accompanied by a full Traffic Impact Assessment, and the highways implications will be considered in terms of:
- Impact on the strategic network
 - Site accessibility
 - Immediate area surrounding the site; and
 - Internally.

Table 1. Forecast buildout rate / 'AM' peak vehicle trips

Build Out Year	Est Number of Dwellings	Vehicle Trips In (AM)	Vehicle Trips Out (AM)	Total Vehicle Trips	Combined Total Trips
2022	44	10	22	32	32
2023	80	18	40	58	90
2024	80	18	40	58	148
2025	80	18	40	58	206
2026	80	18	40	58	264
2027	80	18	40	58	322
2028	80	18	40	58	380
2029	80	18	40	58	438
2030	80	18	40	58	496
Post plan	16	4	8	12	508

Table 2. Forecast buildout rate / 'PM' peak vehicle trips

Build Out Year	Est Number of Dwellings	Vehicle Trips In (PM)	Vehicle Trips Out (PM)	Total Vehicle Trips	Combined Total Trips
2022	44	21	14	35	35
2023	80	38	25	63	98
2024	80	38	25	63	161
2025	80	38	25	63	224
2026	80	38	25	63	287
2027	80	38	25	63	350
2028	80	38	25	63	413
2029	80	38	25	63	476
2030	80	38	25	63	539
Post plan	16	8	5	13	552

Overarching approach to the Local Plan sites & Cumulative Impacts

- 10.23 In terms of the Local Plan allocation sites, the Kirklees Local Plan sets out a sustainable strategy for planned growth currently up to 2031, including proposals for planned mitigation to the local road network. This is underpinned by an extensive district wide strategic modelling exercise of a transport network (which takes into account current local road network/public transport use and forecasts planned growth). The modelling also takes into account local, cross-boundary road network issues connecting into neighbouring authority areas.
- 10.24 From the perspective of transport, the cumulative transport impacts of the Local Plan land allocations, (together with existing local road network use and development which has planning permission but which is not yet built) are understood. This evidence provides a significant material planning consideration in the determination of planning applications and has informed the council's Infrastructure Delivery Plan that identifies potential mitigation measures at current and forecast areas of congestion.

10.25 Within the context of the local highway network and the application site planned improvement works within the area at the “Longroyd Bridge junction and associated corridor works” are being designed with funding to deliver the schemes being secured via the West Yorkshire Transport Fund and developer contributions.

Quantification and assessment of impact (strategically)

10.25 This was carried out using the Council's own generation, distribution and assignment calculations. The latter two elements were undertaken using a gravity model and hand assignment. The impact was determined using the developer’s traffic signal operational assessment model (LINSIG) that the Council's UTC Team has deemed fit for purpose. The primary concern is the first signalised junction on the network; Blackmoorfoot Road and the junction of Park Road East and West. A summary of the LINSIG results is reproduced below:

Average Delay per vehicle in the junction (secs)								
	2017 Surveys	2022 traffic growth BUT NO development at Black Cat	2022 traffic growth WITH development at Black Cat	Increase in delay in 2022 as a result of Black Cat development		2031 Traffic Growth BUT NO development at Black Cat	2031 Traffic Growth WITH development at Black Cat	Increase in delay 2022 to 2031 as a result of Black Cat development
AM	26.7	31	49.5	18.5 (49.5-31)		34.8	79.1	48.1 (79.1-31)
PM	27.0	33.9	66.4	32.5 (66.4-33.9)		40.9	111.1	77.2 (111.1-33.9)

10.26 The impact of the proposed development can be clearly seen. For example in the PM the average delay per vehicle at the junction *without* the development is 40.9 seconds, but *with* the development it is 111.1 seconds. Clearly this is the worst-case scenario, but on average, in both AM and PM scenarios the development adds an extra 25 seconds to existing delay in 2022 ((18.5+32.5)/2) and over a minute (1 minute) in 2031 ((52.4+84.1/2)) The mean maximum queues in both scenarios show some quite significant increase too:

Mean Maximum Queue Length (m)								
	2017 Surveys	2022 traffic growth BUT NO development at Black Cat	2022 traffic growth WITH development at Black Cat	Increase in queue length in 2022 as a result of Black Cat development		2031 Traffic Growth BUT NO development at Black Cat	2031 Traffic Growth WITH development at Black Cat	Increase in delay 2022 to 2031 as a result of Black Cat development
AM	41.8	58.9	96.9	38 (96.9-58.9)		68.6	147.1	88.2 (147.1-58.9)
PM	43.7	70.3	126.4	56.1 (126.4-70.3)		87	202.8	132.5 (202.8-70.3)

10.27 Whilst it is accepted that congestion will increase at the junction in line with current traffic forecasts without the development, it is the scale of extra delay and queue length that this development incurs that is of note for this assessment.

This notes sets out to answer the following two questions:

- 1- What is the effect of the development on the local highway network?
- 2- What mitigation might be necessary?

The first question is addressed with the work detailed above. It is understood that this it only looks at the one signalised junction on the highway network, but this is the one that is most problematic as it is the first one the traffic encounters on the network after having been generated, distributed and assigned from the site. There are of course other junctions where the impact may be substantial, but this is the one that needs to be solved first in terms of mitigating the effect of the development, which brings the second question to the fore.

Site Accessibility

Accessibility by Bus

- 10.28 The closest bus stops to the site are located along Blackmoorfoot Road along the southern frontage of the site which are approximately 300 metres from the centre of the application site. The eastbound bus stop has a bus pole displaying service information, whilst no facilities are provided for the westbound bus stop. Additional bus stops are located on Felks Stile Road at its junction with Blackmoorfoot Road these bus stops are located approximately 630 metres from the centre of the planning application site. The south-east bound bus stop includes a bus shelter with bus service information whilst the bus pole displaying service information is provided for on the north-west bound bus stop. All of the bus stops located within the vicinity of the application site can be accessed via the existing and proposed pedestrian infrastructure located on Blackmoorfoot Road and Felks Stile Road.

Summary of Bus services:

Service no 393

Huddersfield – Thornton Lodge – Linthwaite –Blackmoorfoot 1 bus per hour from AM peak finishing at PM peak with no evening service. Saturday service hourly with no Sunday Service

Blackmoorfoot – Linthwaite– Thornton Lodge –Huddersfield 1 bus per hour from AM peak finishing at PM peak with no evening service. Saturday service hourly with no Sunday Service

Accessibility on Foot

- 10.29 The primary pedestrian desire lines will be to the east toward Huddersfield town centre. At present a pedestrian footway with a minimum width of 2 metres are located on the northern side of the carriageway. This footway runs along the entirety of the frontage of the site and links with the extensive pedestrian infrastructure provided to east of the application site which provides access to local amenities as well as Huddersfield town centre.

Pedestrian crossing facilities are provided for on Blackmoorfoot Road in the form of Zebra crossing which is located 900 east of the application site. This crossing provides safe pedestrian movement across Blackmoorfoot Road and provides pedestrian access to Dryclough CoE Infant School which is located on Dryclough Road. As part of the development proposals it is proposed to provide pedestrian linkages to this existing pedestrian footway at the proposed site access junctions as well on the eastern boundary of the site which will provide access to the nearby village of Cowersley.

10.30 What mitigation might be necessary?

The Transportation section has looked at the Blackmoorfoot Road and the junction of Park Road East and West in a lot of detail and due to the constrained nature of the junction and the fact that there are properties on all sides abutting the highway boundary, it is difficult to find a solution that does not involve some kind of substantial land take. In instances where this occurs, the advice from the Department for Transport is to undertake some form of dynamic modelling on the basis that drivers will not all take the same route from the development through the junction in question as a result of the congestion. The assessment undertaken to date assumes a fixed route matrix.

- 10.31 The information above indicates that there will be an impact on the existing road network, increasing waiting times during peak hours. The options to improve the network (ie junctions along Blackmoorfoot Road, are limited given the amount of additional land take that would be required.
- 10.32 At the bottom of Blackmoorfoot Road near Longroyd Bridge there is an opportunity to improve the Longroyd Bridge junction, that would have a benefit for the wider area of SW Huddersfield. An appropriate financial contribution towards this scheme from the Black Cat development would be £592,000, and this would need to be secured via a Section 106 Agreement.
- 10.33 The immediate site and surrounds and proposed access. The 2 principal access points are considered to be in satisfactory locations (indeed the Blackmoorfoot Road entrance is essentially the existing Standard Drive into the Black Cat factory site). Adequate visibility can be achieved, and there is no conflict with accesses on the opposite side of the road either on Blackmoorfoot Road or Felkes Stile Road. Additional information confirming these points has been requested but is still outstanding.
- 10.34 Internal layout. This application is outline only with layout being a reserved matter. However the indicative masterplan does show a broadly acceptable street pattern, with appropriate breaks the street hierarchy to facilitate good improved layout, and appearance, with the use of private drives and shared access ways. It is considered that the layout shown could be satisfactorily served by refuse disposal wagons, and any associated deliveries.
- 10.35 There are a number of footpaths to the north of the site within the linear park area, and the site does link to an existing footpath at the NE corner of the site onto Crosland Hill Road. There is a pedestrian link across the whole site SW-NE that links Felkes Stile Road to Crosland Hill Road, this is within a central green "spine" that crosses the site. There are a number of links to other parts of the site, including open space areas, and also links out onto the Linear park and the existing footpath network. As such it is considered that the masterplan makes good provision for pedestrian usage and delivers a permeable scheme.

Urban Design and Heritage issues

- 10.36 The scale of the site is such that the masterplan approach required in policy PLP5 of the Emerging Local Plan is wholly appropriate. The masterplanning approach that has been undertaken since the pre-application stages has been constructive and taken account of public consultation, site constraints and technical constraints (eg drainage solutions.) but the issue of site density and housing mix is an outstanding matter that hasn't been resolved which goes to the heart of the matter.
- 10.37 The indicative layout provides for a density of approx. 32 per ha in design terms is not unacceptable. However given the size of the site it is considered possible to increase the density to approx. 35 per ha in accordance with the guidance in the Local Plan and still deliver a scheme that is appropriate for the area. There will need to be significant reasons why a minimum of 35 dwellings per hectare cannot be achieved and officers have requested that the applicants address this point particularly how it relates to wider policy implications on affordable housing and for aiding development viability.
- 10.38 With the exception of the care apartments the majority of the housing appears to be 2 no storey, which is considered to be acceptable in this location. Given the sites prominence, as viewed from distance from the north, it is considered that low rise buildings are a more satisfactory solution within the wider landscape.
- 10.39 The scheme includes substantial areas of open space with large areas located at the main entrance points off Blackmoorfoot Road and Felkes Stile Road, a central linear spine of open space set adjacent to a footpath and a central park area. In addition to the north the Green belt land, also within the ownership, of the applicant is retained in open use as a linear park associated with the footpaths that run along it, and a sizeable natural play area to the NW of the site. The use of the adjoining areas of green belt to as part of a coordinated scheme to deliver the necessary and accessible open space is supported in this instance as it allows for a greater developable area within the allocation
- 10.40 The indicative layout, for the most part shows the housing set back from the two road frontages, with ample room for landscaping and retention of existing mature trees. Although there are no objections to the indicative layout from a design perspective, the masterplan is considered contrary to the requirements of LP5 as the housing types and numbers shown do not achieve a layout which provides for affordable housing requirements and also impacts negatively on viability to provide education requirements.

Heritage

- 10.41 On the boundary on the NE edge of the site is a grouping of listed buildings off Crosland Road, and Farmhouse Court that are listed structures including Grade 2* Crosland Hall. This grouping is of outstanding character and is a heritage asset of the highest significance.

- 10.42 The grouping has an extensive garden area which extends to the NE boundary of the application site which is bounded by dry stone walling. The site adjacent the listed grouping is currently a field under plough, with the green field edge and a number of trees within the field edge. It is proposed to retain approximately half of this field (approx. 30m depth) as open land to create a buffer zone between the site and the listed grouping to safeguard its setting. In addition there is additional tree planting proposed along that boundary to augment the existing trees. As such it is considered that the setting of the Grade 2* listed building is adequately safeguarded.

Landscape/Tree and Bio-diversity issues

- 10.43 The application has been accompanied by a Landscape Visual Impact Assessment, given the sites scale and prominence as viewed from distance, especially across the Cone Valley to the north. It is considered that the LVIA has been robustly undertaken with numerous receptors included in all directions, and the level and scope of the impact of the development of this site accurately. The existing landscaping and trees which surround significant parts of the site have been retained in order to mitigate against the impact and “intervene” with certain views. The retention of the linear park area (within the Green belt), located on the ridge line reduces the impact of the site as viewed from the north. The low level nature of the development, ie mainly 2 no storeys, set in from the edges of the site is considered appropriate for this location.
- 10.44 The protected trees around the perimeter of the site should be capable of being retained and incorporated into any layout as indicated on the masterplan, and a landscape scheme across the site could add to the existing levels of tree cover.
- 10.45 Within the site there are a number of areas of open space and green corridors that spread across the site, and are linked by footpath, and accessible to potential future users. Any POS for this scheme needs to be contained within the site, and there is a possibility of utilising the POS area on the NW edge as a “natural play area”. At any reserved matters stage landscape details would be required confirming the level and position of open space throughout the site, as well as proposals for streetscape planting to secure a greener streets within the development.
- 10.46 The applicant has submitted an Ecological Assessment that is based on sufficient scope to allow the likely impacts to be assessed for outline purposes. A number of important ecological factors present within the site that would require further investigation in order to inform adequate mitigation or measures for protection. The area to the north of the site, within the Greenbelt, and associated planting is located is located within the Kirklees Wildlife Habitat Network, and there is an area of woodland that is indicated as being potentially removed that is of value, and the justification for this still needs to be made.
- 10.47 The creation of linear areas of open space linked together with footpaths is supported in principle.
- 10.48 There is substantial additional survey work needed to adequately inform a satisfactory layout that satisfactorily conserved what is of importance within the site, as well as delivering necessary enhancement. This should be conditioned and be an integral ingredient in the master planning of the site

Drainage Issues

- 10.49 The site is located within Flood Zone 1 (ie the area least likely to flood), however given the size of the site, the applicant has submitted Flood Risk Assessment covering the issue of surface water issues on the site.
- 10.50. Given the slope across the site, and the underlying geology, there are large areas of the site that are unsuitable for infiltration, and on site storage would be necessary, with discharge at an agreed rate for the entire site as agreed by Yorkshire Water Authority. Given the scale of the site and the mix of uses and surfacing (ie there are very extensive areas of hard standing associated with the existing factory) there will need to be 2 outfalls ie Outfall A to Crosland Hill Road, and Outfall B to Blackmoorfoot Road Road and one it is proposed to condition the appropriate levels of discharge, as well as a reduction in existing run off from the hard standing areas. These rates would be Outfall A 27l/s and Outfall B 61l/s.
- 10.51. Given the increase in intensity of the use of Felkes Stile Road, additional on street drainage measures are likely to be required.
- 10.52 The issues of drainage, including temporary drainage during construction, and overland flood routing, are all capable of being dealt with by condition, and it is noted that the Environment Agency, Yorkshire Water Authority and the KC Lead Local Flood Authority, all raise no objections and are supportive of the scheme.

Environmental Issues. (Decontamination/remediation; air quality; noise/odours; and lighting

- 10.53 *Decontamination/remediation*- The applicants have submitted a Contaminated Land Report that has been found to be acceptable by Environmental Health Services. This report itself recommends a full ground gas assessment, be completed, prior to the adoption of any mitigation strategy. It is recommended that this be included within the conditions requiring the submission of a remediation statement and any necessary validation.
- 10.54 *Noise /odours*- The applicant has submitted a Noise report with the application that identifies 4 locations around the site for potential, traffic noise sources for new dwellings, but has also includes an assessment of potential noise from a nearby stone saw shed. Overall the report is considered to be satisfactory, and demonstrate that issues regarding noise on the site can be resolved by conditions and these are recommended. Given the scale of the site the mitigation, if needed at all should be provided a part of any full or reserved matters application that seeks approval for layout.
- 10.55 The issues of noise / odour relating to the 500 sq m multipurpose unit, need to be covered by conditions which extend to any potential end use of that building which might extend to food preparation uses eg A3, A4 and A5.
- 10.56 *Air Quality*- An Air Quality Impact Assessment has been submitted with the application, which covers the site as both a potential receptor and emitter. The report indicates that there would be a slight impact upon some receptors on Manchester Road, where the Council has declared an Air Quality Management Area However the impact is not sufficient reason to recommend refusal.

- 10.57 The size of the site is such that it falls into the category of a major development as defined in the West Yorkshire Low Emissions Strategy. Any Air Quality Assessment should therefore, should seek to quantify and value the predicted damage costs, and if necessary identify appropriate mitigation measures. As such the issue of Air Quality can be satisfactorily addressed by requiring the submission of a predicted damage calculation and an appropriate mitigation scheme. Also given the residential use, a condition requiring the provision of electric charging points would be appropriate.
- 10.58 *Lighting*- The applicants have submitted a Lighting Assessment of the site and its relationship to the surrounding area. The site is currently on the edge of town and the assessment has been carried out to ensure the site can be developed within the parameters of Environment Zone 2- the equivalent light generation/ environment of a rural area or village (the relevant zones range from E0- E4, with E0 being areas protected from any light pollution to E4 which would be a town or city centre.) Given the scale of the site, and the potential for impact of light pollution from distance this is considered to be an appropriate zone, on the fringes of a built up area.
- 10.59 Also given the nature of the site and the presence of certain habitats within and adjacent the site, this relatively low level of illuminance allows for habitat protection where necessary (eg in relation to trees on the edge of the site which are being retained) as a means of seeking bio diversity enhancement.
- 10.60. As such the issue of lighting can be satisfactorily covered by conditions, which should stipulate (as have the applicants themselves) that the lighting levels conform to the limitations for Environment Zone 2, in the relevant guidance.

11.0 CONCLUSION

- 11.1. The site is allocated for housing on the Kirklees Local Plan, the number of units proposed of 700 equates to a density (of the developable area of the site of just over 32 per ha according to the applicant). The site's inclusion within the Kirklees Local Plan, as an entirely housing allocation, confirms that the site is within a sustainable location, and the presumption is in favour of any new development subject to compliance with other relevant policies within the Kirklees Local Plan and guidance within the National Planning Policy Framework.
- 11.2. The principle of residential development is clearly acceptable, and regarding the extensive range of technical matters involved in developing a site of this scale ie drainage, remediation lighting, access, and air quality have all been satisfactorily addressed at this Outline stage and can be appropriately conditioned.
- 11.3. An illustrative layout has been submitted with the outline application with only access applied for at this stage. It is recognised the applicant has achieved the target of 700 dwellings stated in the Local Plan allocation. This illustrative layout is considered acceptable in design terms but should the quantum of development be increased with an acceptable design it is considered possible to achieve a viable scheme which would result in an indicative masterplan which would satisfy the masterplan policy LP5.

11.4. The level of contributions suggested within the Viability appraisal is substantially below policy requirements for both affordable housing and education as detailed within the Kirklees Local Plan, and it is considered that in accordance with the guidance contained in the National Planning Policy Framework, the presumption should be that new adopted sites should be viable. The Council's up to date CIL examination evidence would further support this position that allocated sites should be able to achieve 20% affordable housing. A viability appraisal has been undertaken and assessed, however the initial Section 106 offer has not been formally improved and the justification for this offer is not accepted. Accordingly the proposal is recommended for refusal.

Background Papers:

Application and history files.

Website link to be inserted [here](#)

Certificate of Ownership – Notice served on/ or Certificate A signed: Certificate B Signed. Notice Served on Mr Bates and New Wharton Holdings Ltd

APPENDIX B

Kirklees Borough Council Draft EIA Screening Opinion

KIRKLEES COUNCIL INVESTMENT AND REGENERATION SERVICE

THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017

SCREENING OPINION

CASE DETAILS

Applicant Reference: DPA/MC0692

Planning Application / Pre-application Reference: N/A

Site Address: Land off Blackmoorfoot Road and Felks Stile Road, Huddersfield (Black Cat site)

Proposed Development:

- Demolition of all existing buildings and structures;
- Construction of up to a total of 770 dwellings (comprising a mix of houses and with potential for construction of 70 care apartments in the form of a low-rise block of flats, including a doctor's surgery of up to 350m²);
- The construction of a local centre of up to 500m² of flexible A1/A2/A3/A4/A4/D1 (dual use);
- The construction of two primary vehicular access points off Blackmoorfoot Road and Felks Stile Road;
- The development of approximately 7 ha of public open space; and
- Associated engineering, drainage, access and ancillary site works.

Area of Development / Works / New Floor space (as appropriate):

The site extends to 29.3 hectares (ha). It is allocated for housing within the Kirklees Local Plan (HS23) with an indicative capacity of 684 dwellings during the Local Plan period with potential for a further 16 dwellings beyond the plan period (700 dwelling).

EIA DETAILS

Schedule 1

Is the proposed development Schedule 1 development as described in Schedule 1 of the EIA Regulations?

No

If yes, under which description of development, i.e. No's 1-21

Schedule 2

Is the proposed development Schedule 2 development as described in Column 1 of Schedule 2 of the EIA regulations?

Yes

If yes, under which description of development in Column 1, i.e. No's 1-13?

Schedule 2, Column 1, 10(b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.

Is the development within, partly within, or near a 'sensitive area' as defined by Regulation 2 of the EIA Regulations?

The site does not fall within a sensitive area and it lies 1.7k from the nearest statutory sensitive area.

If yes, which area

It lies approximately 1.7km from the South Pennine Moor Special Protection Area (SPA).

Beyond that, the nearest statutory designations (including the Peak District National Park, the Dark Peak Site of Special Scientific Interest and the Peak District Moors Special Protection Area) are located approximately 5km to the west/south west of the western edge of the site. The nearest non-statutory designation is to the north and north eastern boundary of the site (a UK BAP priority habitat).

Are the applicable thresholds / criteria in Column 2 exceeded /met?

Yes

If yes, which applicable threshold / criteria?

It exceeds the threshold at Column 2, 10(b) (ii) as the development includes more than 150 dwellings.

SCREENING OPINION

The National Planning Guidance advises that when screening Schedule 2 projects, the local planning authority (LPA) must take account of the selection criteria in Schedule 3 of the 2017 regulations. It confirms that not all the criteria will be relevant and each case should be considered on its merits in a balanced way. It also confirms that only a very small proportion of Schedule 2 development will require an Environmental Impact Assessment.

To aid local planning authorities to determine whether a project is likely to have significant environmental effects, the NPPG includes a set of indicative thresholds and criteria to indicate the types of impact that are most likely to be significant for particular types of development. For projects that fall within 10(b), it suggests an indicative threshold on sites which have not previously been intensively developed would be where the (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

Nevertheless, when screening Schedule 2 projects, the local planning authority must take account of the selection criteria in Schedule 3 of the 2017 Regulations, which are considered below.

Characteristics of Development

Schedule 3 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 confirms that the first stage in the selection criteria for screening Schedule 2 development is a consideration of the characteristics of the development with particular regard to:

- a) The size and design of the whole development;
- b) Cumulation with other existing development and/or approved development;
- c) The use of natural resources, in particular land, soil, water and biodiversity;
- d) The production of waste;
- e) Pollution and nuisances;
- f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;
- g) The risks to human health (for example, due to water contamination or air pollution)

The application site exceeds 5ha, which is the indicative threshold in Column 2 of the EIA Regulations for development that may be subject to EIA. It is, however, comfortably below the identified threshold of 1000 dwellings for development that would have significant urbanising effects in a previously non-urbanised area.

In this context, it is acknowledged that the proposal would result in a substantial scale of development. The indicative masterplan indicates that it would extend to up to 770 dwellings, including the potential for a 70-bed care facility. It would also include a doctor's surgery and the construction of up to 500m² of flexible A1/A2/A3/A4/A4/D1 (dual use) in the form of a local centre. This proposal would exceed the indicative capacity within the Local Plan. However, the primary use would be residential, which can be considered a reasonably sensitive end use in terms of its environmental harm over the lifetime of the development.

Cumulative development

in terms of cumulative development, Planning Practice Guidance advises that:

'Each application for a [screening opinion] should be considered on its own merits. There are occasions where other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development. The local planning authorities should always have regard to the possible cumulative effects arising from any existing or approved development'

There may be potential cumulative impacts as a result of this proposal, particularly relating to the traffic impact on nearby junctions.

In terms of the relationship to existing development, these include the quarry to the south of the site and the caravan storage and sales site to the east. However, the traffic generation arising from these existing uses, whilst including HGV vehicles, is already accounted for on the highway network. Having regard to nearby approved development, it is considered that the outline planning permission at the former St Luke's Hospital is most relevant (ref: 2014/93099 and subsequent variations). This allows for up to 200 dwellings, with retail provision and a number of local neighbourhood uses at the site.

Nevertheless, the application would be supported by a full Transport Assessment, which would take account of the impact from such cumulative development.

During the construction phase, there is potential for traffic impacts resulting from the arrival and departure of HGVs and other construction traffic. However, these impacts would be temporary in nature and could be managed through the imposition of relevant planning conditions e.g. a Construction Environmental Management Plan.

In relation to the operational phase of the development, the applicant has confirmed that traffic surveys have previously been undertaken at the following junctions near to the site in order to support the Transport Assessment:

Blackmoorfoot Road/Site Access priority controlled junction;
Felks Stile Road/Site Access priority controlled junction;
Blackmoorfoot Road/Felks Stile Road priority controlled junction;
Blackmoorfoot Road/Sands House Lane priority controlled junction;
Blackmoorfoot Road/Park Road/Park Road West signal controlled junction;
A62 Manchester Road/Blackmoorfoot Road/Birkhouse Lane signal controlled junction;

A62 Manchester Road/St. Thomas Road/Waterside signal controlled junction;
A62 Manchester Road/Longroyd Lane signal controlled junction;
A616 Lockwood Road/B6108 Meltham Road/Swan Lane/Bridge Street signal controlled junction; and
Cowersley Lane/Gillroyd Lane/Church Lane priority controlled junction.

The results of the traffic impact assessment and subsequent junction analysis would be carried out to reflect the uplift in dwellings to 770. The initial analysis indicates that there would not be a severe impact arising on the following junctions as a result of the proposed development. They have also highlighted that no objections were raised on transport grounds to the previous outline application on the Black Cat site.

On the basis that any future application would be subject to a detailed Transport Assessment, it is therefore considered that the cumulative impact of the proposal in this regard would be reasonably localised and it would be unlikely to result in significant environmental effects.

The use of natural resources, in particular land, soil, water and biodiversity

Natural resources would be utilised in the manufacture of building materials used on the site and in the construction of site infrastructure. However, the applicant confirms that the amount of natural resources used on site and as part of the development could be minimised through best practice to meet relevant targets (e.g. waste recycling, cut and fill strategies, reusing materials on site where possible, and through the incorporation of sustainable energy measures). It is also not considered that this development is of a type that would require a proportionately higher consumption of such resources.

With regard to water, the whole site is located within Flood Zone 1, which indicates a low probability of flooding. There also are no watercourses or ponds situated on or within close proximity to the site. The site area does exceed 1ha and therefore, any application would need to be submitted by a Flood Risk Assessment. A drainage strategy would also be required to demonstrate how foul and surface water run-off will be controlled and managed within the site in a manner that will be acceptable to the Lead Local Flood Authority, who will be a statutory consultee. Subject to the FRA demonstrating that risks from flooding can be mitigated in an acceptable manner and that an appropriate drainage strategy can be achieved, it is unlikely that the proposal would result in significant effects in this regard.

Bio-diversity

The site itself is a housing allocation and it is not in a sensitive area as defined by the EIA Regulations. Accordingly, it is not a protected area that is designated or classified for any specific ecological value nor are there any non-designated / non-classified areas, which are important or sensitive for reasons of their terrestrial, avian and marine ecological value. It does include some woodland, which is locally important as a wildlife corridor/habitat as part of the Kirklees Wildlife Habitat Network. This also extends to the land to the north of the site. It does also include a range of natural

habitats and supports some protected species including bats, badgers and potentially breeding birds.

However, an Ecological Assessment would be a requirement of the planning application and it is considered that any potential impacts would be localised and would be unlikely to be significant, as the most important ecological features within the site would be retained. Furthermore, appropriate mitigation could be secured along with a requirement for bio-diversity net gain. Any effects on protected species are also capable of mitigation. Again, it is therefore unlikely that the proposal would result in significant effects in this regard.

The production of waste

A substantial quantity of waste would be produced as a result of the demolition of the existing site buildings, although it may be appropriate to use some of this material as aggregates during the construction phase of the development. Waste building materials would be generated from the use of building materials on site. All waste not used in the development will require transporting from the site for processing or final disposal. However, the applicant has indicated that it is expected that a site waste management plan would be implemented which would identify how waste generated at the site could be reduced, re-used or recycled.

Once the development is completed municipal waste would be generated by the occupants. However, this would not be in quantities above those generated within other such residential developments within the district and would be dealt with in the usual manner.

Pollution and nuisances

It is considered that there are several potential sources of pollution or nuisances associated with this proposal during construction or following completion as outlined below:

Noise and vibration

The demolition of the existing buildings and the subsequent construction of the new dwellings and associated infrastructure would involve the use of heavy machinery including mechanical excavators and dump trucks etc. Noise would therefore be generated by the vehicles themselves and when heavy vehicles are loaded and unloaded and there may be vibration impacts arising from work on site. There are residential properties in the area concentrated to the north and east. The closest of these residential properties (Mason Court) are located immediately adjacent to the eastern boundary of the site. However, any noise and vibration generated during the construction phase would be temporary and localised and not atypical of a construction site. Furthermore, a detailed Noise and Vibration Impact Assessment would be submitted with the application and once the site is occupied, noise levels in particular would reduce to those normally associated with a residential area.

Air Quality

It is considered that there are likely to be two main impacts on air quality associated with this proposal. These relate to dust generated during the demolition and construction phase and as a result of increased traffic once the residential properties have been occupied.

The main sources of dust generation would be likely to result from the movement of demolition minerals during dry conditions and vehicle movements within the site. However, damping down measures are usually carried out on construction sites to mitigate against the effects of dust generation. Like noise, the generation of dust would be a temporary problem which would cease on the completion of construction works and could be mitigated through the inclusion of relevant planning conditions.

The proposal would also be designated as a major development for the purposes of the West Yorkshire Air Quality Emissions Strategy and any subsequent planning application would need to provide details of satisfactory mitigation measures to offset the level of monetised damages calculated regarding its predicted impact on air quality. Furthermore, the applicant has confirmed, that any application would be supported by an Air Quality Impact Assessment. This would, in particular, need to address any potential impact upon some receptors on Manchester Road, where the Council has declared an Air Quality Management Area. However, the impact is considered to be localised and not significant for the purposes of an EIA.

Site Contamination

The site has been used for over 100 years for the manufacture and storage of fireworks and it is therefore likely that the site is contaminated. The Screening Request confirms that due to the current and historic use of the site, a Phase I and Phase II Geo-Environmental Site Assessment have been undertaken. This confirms the presence of contaminants that have potential to adversely impact human health unless treated prior to development (namely the presence of elevated heavy metals, PAH, asbestos, naphthalene and TPH C16-C21). However, it is considered that standard mitigation and remediation measures could ensure that the site is appropriately remediated to relevant standards so that it would be suitable for the proposed residential end-use. These could be secured by means of appropriately worded planning conditions in the event of a recommendation for approval. It is considered that this issue would not amount to EIA development.

The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge.

The proposed development would principally comprise residential development, which would not constitute a high risk end user, nor would it give rise to a risk of major accidents and/or disasters. Any risk of accidents during the construction phases would be localised and it could be controlled through standard health and safety measures.

The risks to human health (for example, due to water contamination or air pollution

These are considered above.

It is also recognised that there may be cumulative impacts (such as air quality and noise) arising from existing nearby uses such as the quarry to the south of the site and the caravan storage and sales site to the east. However, it is determined that any such impacts are not significant and that they could be adequately addressed through mitigation at the planning application stage.

Location of the Development

Schedule 3 sets out that the location of development must be taken into account in the screening process to determine the environmental sensitivity of the geographical areas likely to be affected by development with specific regard to the following:

(a) The existing and approved land use

The existing site comprises of three main areas;

- (i) The existing Black Cat Fireworks compound: This extends to approximately 17 ha. It contains an industrial firework storage and distribution compound, grass and scrub land, with a varied mixture of office buildings, sheds, reinforced storage buildings and shipping containers linked by several access roads and parking/storage bays. It is understood that the compound was once used for the manufacture of fireworks but it is now solely used for the storage and distribution of fireworks, which are imported to the site from China for distribution across the UK.
- (ii) An area measuring approximately 8 ha that comprises agricultural fields to the west of the fireworks site. This consists of managed grassland and some in-bye fields used mainly for grazing, hay or silage.
- (iii) The area to the east of the site, situated between the existing factory compound and residential dwellings of Crosland Hill to the east. This area extends to approximately 2 ha and comprises a mix of managed grassland associated with the fireworks factory and small scale agricultural fields used for grazing.

The factory compound is the subject of a licence issued under the Explosives regulation 2014 and being a Top Tier COMAH establishment is regulated by the Health and Safety Executive.

(b) The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground

The majority of the site is considered to be brownfield land due to its previous commercial use and associated development. As a consequence, the loss of this land would not have a significant impact on the natural resources of the area.

The proposal would result in the loss of approximately 8ha of agricultural land. However, this land is classed as Grade 4 (Natural England's Regional Land Classification 2010) and it therefore not recognised as the best and most versatile land for agricultural purposes. Due to the relative abundance of this type of land

within the wider area, which tends to be used for grazing or the production of hay, it is considered that its loss would not be significant.

As detailed above, the site does have the potential to provide habitat opportunities for a variety of protected species. However, it is likely that the implementation of precautions during construction and the subsequent introduction of sympathetic landscaping measures as part of the development would mitigate any significant impact. Furthermore this proposal would provide opportunities to enhance biodiversity within the local area through the introduction of wetland areas associated with ponds or sustainable drainage regimes.

(c) The absorption capacity of the natural environment

The site does not contain:

- Significant wetlands;
- Coastal zones;
- Mountain and forest areas;
- Nature reserves and parks;
- Areas designated under EU Directives or national legislation;
- Areas where environmental standards have been exceeded;
- Densely populated areas; or
- Landscapes and sites of historical, cultural or archaeological significance

There are a number of listed buildings (Grade II and II*) in the wider area to the east of the site and the following statutory designated sites which are approximately 5km to the west:

- Peak District National Park
- Dark Peak Site of Special Scientific Interest
- South Pennine Moors Special area of Conservation
- South Pennine Moors Special Protection Area

However, given the scale of this proposal and its location and the distance to statutory designated sites, it is considered that the local natural capacity is sufficient to accommodate the development without having a significant detrimental impact on these designated sites.

Characteristics of the Potential Impact

The final consideration is the types and characteristics of the potential impact. Schedule 3 confirms that the likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account the following:

Extent and magnitude of Impact

This issue must be considered in the context of the existing circumstances both at and surrounding the site and the effect those circumstances already have on the local environment. Whilst this proposal represents a significant development and is likely to lead to some cumulative impacts, it is considered that most of the associated impacts would be confined to the immediate surrounding area and would therefore be of local significance only. As a consequence, it is unlikely that this proposal would lead to any detrimental transboundary effects.

Complexity of the Impact

This proposal involves a large site and would see the creation of a significant number of residential properties and associated infrastructure. There would inevitably be a variety of associated impacts on matters such as:

- Agricultural land
- Air quality
- Ecology
- Flood Risk and drainage
- Ground Conditions
- Landscape and Visual Impact
- Noise and vibration
- Heritage assets
- Highways

However, as it is considered that these impacts would be of local significance only, any detrimental impacts and would not amount to significant environmental impact.

The nature of the Impact

Due to the nature of this proposal it is considered that the probability of the associated impacts would be high although these would diminish to some extent following the completion of the development. Once occupied, whilst impacts associated with matters such as air quality, local highway networks etc. are likely to be permanent, it is possible these effects can be minimised and it is considered that these impacts would be of local significance only.

Transboundary Nature of the Impact

Transboundary impacts are not considered to be applicable for a development of this nature and scale and in this location. The applicant's assessment that the majority of traffic movements would likely be towards Huddersfield rather than into neighbouring boroughs, and drainage would be managed on site so as not to overload the regional network that may increase the risk of flooding elsewhere is considered reasonable in this context. Other matters such as air quality, noise and vibration could also be managed locally / on site to ensure that there would be harmful long-term impacts on the wider areas, including neighbouring boroughs.

Intensity and Complexity of the Impact

It is considered that the impacts associated with this development from the construction to the operation phases will be localised in nature and can be identified and mitigated through the planning application process on the basis that it is accompanied by the suite of technical documents set out in the Screening Request.

Probability of Impact

The Council would concur with the Screening Request that those identified temporary impacts relating to demolition and construction, such as air quality, traffic and noise and vibration are highly probable in the event that development takes place and will last throughout the duration of construction, albeit with management and mitigation measures adopted. Potential localised impacts during the operational phase are also highly probably and would need to be appropriately mitigated through the planning process.

Duration, Frequency and Reversibility of Impact

Impacts associated with the demolition and construction phase would be temporary and, although likely to last several years, would cease once the development is completed. Impacts associated with the occupancy of the site would be permanent.

Cumulation of the Impact with Other Existing and Approved Development

As previously set out, it is not considered that the proposal would have a significant effect on the environment individually or when assessed with existing and approved developments on a cumulative basis.

Possibility of Reducing Impact

There would be the opportunity to reduce the potential impact of the development through mitigation measures, which could be adequately controlled through the imposition of planning conditions or planning obligations.

SCREENING DECISION

Schedule 1 Development - EIA Required

No

Schedule 2 development:

Not likely to have significant effects on the environment.

Decision: EIA not required.

Summary / Reasons: See below.

Current Planning Practice Guidance relating to this type of development indicates that the key issues to consider when carrying out an EIA screening exercise are the physical scale of such developments, the potential increase in traffic, emissions and noise. The guidance provides indicative criteria and thresholds to aid Local Planning Authorities in assessing whether an EIA is required to support development proposals. For this type of development these indicate that Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination. Sites which have not previously been intensively developed: (i) area of the scheme is more than 5 hectares; or (ii) it would provide a total of more than 10,000 m² of new commercial floorspace; or (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings).

In this case the site comprises previously developed land and open greenfield land. However, the brownfield element of the site has not been intensively developed and for the purposes of this screening opinion it is felt that the whole site should be considered as a site which has not previously been intensively developed. Having said this, due to the previous use of the site, the issue of contamination is relevant in this instance.

Whilst the indicative criteria and thresholds indicate that an EIA is more likely for a site exceeding 5 hectares, it also suggests that EIA is more likely for development which would have a significant urbanising effect (e.g. more than 1000 dwellings). Although this site is considerably larger than 5ha, the number of dwellings associated with this proposal is less than 1000. Bearing in mind the site's proximity to existing nearby urban development, including the current fireworks compound, it is not considered that the scale of this proposal is such that it would have a significant urbanising effect on this area.

Parts of the site are likely to be contaminated due to its previous use. However, it is considered that this issue could be satisfactorily addressed through the submission of a comprehensive intrusive contaminated land survey in support of a subsequent

planning application which identifies the nature of contamination and proposed mitigation measures.

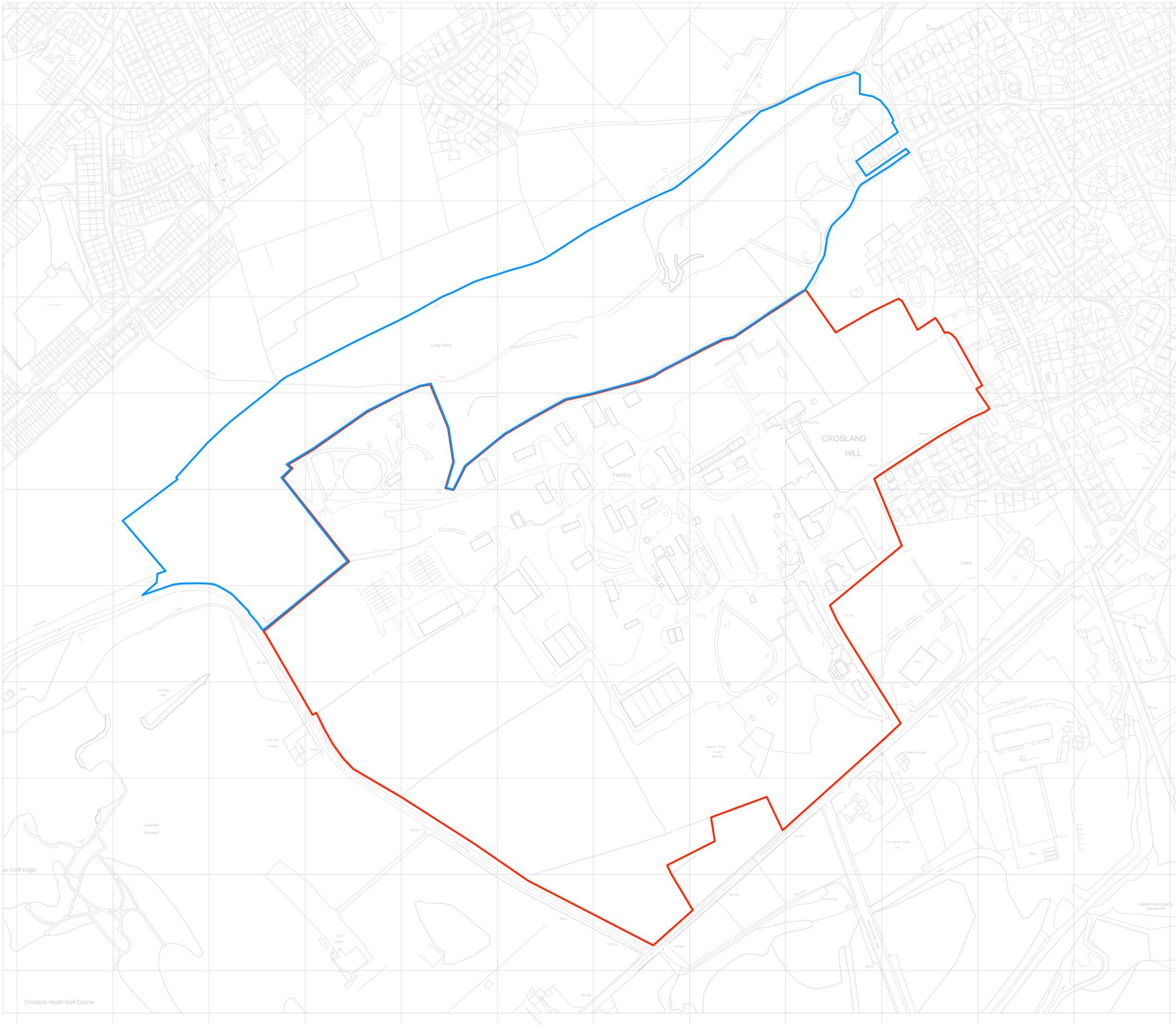
It is the Council's opinion that whilst this proposal is a significant development which will lead to some cumulative effects, the associated environmental impacts likely to result from it would be of local significance only. As a consequence, the Council confirm that the above described proposal would not constitute EIA development.

Recommendation and Authorisation Box

Officer Signature		Date:	
Team Leader Signature:		Date:	

APPENDIX C

Site Location Plan



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- NOTE:**
1. Do not scale from this drawing. Always work to noted dimensions.
 2. All dimensions are in millimetres unless otherwise stated.
 3. All setting out, levels and dimensions to be agreed on site.
 4. The dimensions of all materials must be checked on site before being laid out.
 5. This drawing must be read with the relevant specification clauses and detail drawings.
 6. Order of construction and setting out to be agreed on site.

- KEY**
- Application site boundary
 - Green belt land within ownership boundary

Issue	Date	Status	Drawn	Apprvd.
02	02.03.18	OUTLINE PLANNING	HB	AR
01	22.01.18	TITLE CHANGED FOR PLANNING	HB	AR
00	04.12.17	FOR DISCUSSION	HB	AR

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Client: Gerald Eve
 Project: Crosland Moor Huddersfield
 Drg Title: Site location plan

Created on: 04.12.17 Created by: HB Approved by: AR

Scale: 2000 Size: A1 Status: PLANNING

Drg No.: PL1713-AB-005 02