

4 December 2022

For the attention of Victor Grayson, Kirklees Planning

I wish to object strongly to planning application 2021/92603 - Proposed development on land to the west of the M62 and south of Whitehall Road, Cleckheaton, BD19 6PL.

The previous objections that I have raised still stand as the concerns I raised in those have not been addressed by the applicant's latest documents. I have the following additional comments.

Inaccuracies:

The revised documents submitted by the applicant cannot be relied upon as they are full of errors and misleading information, including references to incorrect roads (including one which is not in West Yorkshire), referring to Cleckheaton as being the nearest settlement (not Scholes Village) and claiming facilities at service stations which do not exist. No decision can be made until someone with the appropriate local knowledge and technical expertise has had chance to look in detail at every document and receive clarification from the applicant as appropriate. Given that local people with no technical knowledge have been able to spot numerous inaccuracies, it is likely that there are also inaccuracies in the technical documents which lay people are unable to spot. According to the National Planning Policy Framework "The right information is crucial to good decision-making".

HGV waiting areas:

I am relieved to read that the operation will no longer be 24 hours, given that the entrance on Whitehall Road will be closed between 23.00 and 07:00 (as stated at 2.3.55 of document 958911). This shortening of the opening hours is welcome. However, it raises the question as to where HGVs arriving during the closed hours, and indeed during the day out of their scheduled time, will park. The applicant has provided a list of local service stations which only serves to prove that the only service station which has parking for HGVs and facilities such as toilets is Hartshead Moor service station on the M62. Sending drivers here will further increase traffic on the M62 and drivers are unlikely to want to pay the parking fees here. This will result in HGVs parking on local roads, which do not have the capacity to take them, and the drivers will have no facilities such as toilets. The list of service stations is factually incorrect – for example, there is no toilet at Tesco in Cleckheaton. The applicant should be required to have on-site parking and facilities for all HGVs and their drivers, even if they arrive outside their scheduled time. This is required by NPPF 109: *Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.*

Traffic assessments:

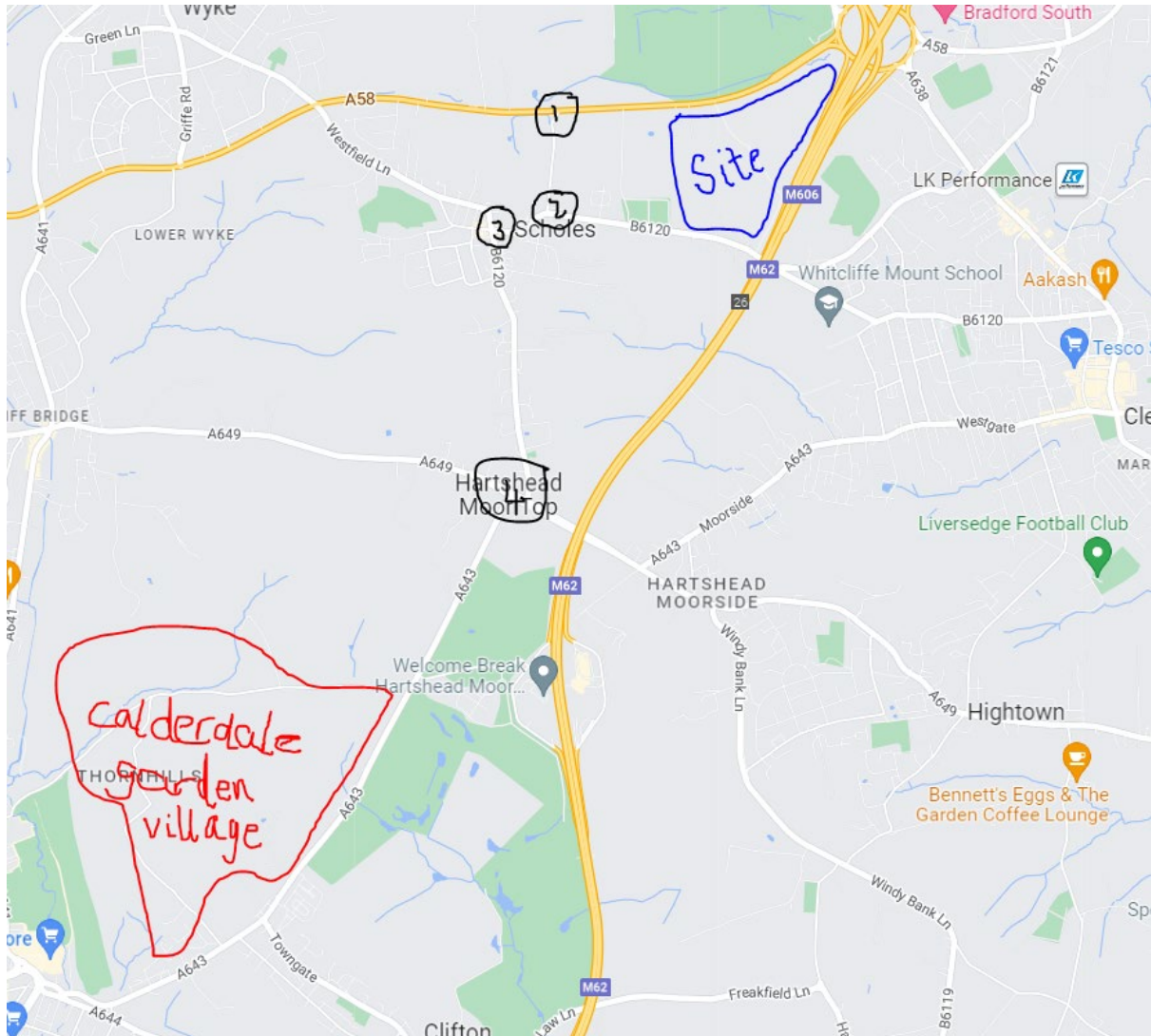
The updated traffic assessments are very difficult for a lay person like myself to understand and I trust that the Council has experts looking at these in detail, assessing their accuracy and that they are consistent with the rest of the application. The points I would like to raise in connection with these are:

- No assessment has been carried out on the impact of traffic on the following junctions (circled on the map below):
 - 1: Branch Road with Whitehall Road (A58)
 - 2: Branch Road with Whitechapel Road
 - 3: Crossroads in the middle of Scholes (Scholes Lane/New Road East/Westfield Lane/Tabbs Lane)
 - 4: Scholes Lane junction with Halifax Road

I have pointed this out twice in my previous objections so I am disappointed that this still has not been done. These are all already tricky junctions to negotiate and will experience an

increase in traffic as a result of the proposed development, particularly during the construction phase.

- There is still no mention anywhere of the potential impact of the huge Calderdale Garden Village development proposed to be built on the border of Calderdale and Kirklees which is intended to include 2000 homes, a primary school and a secondary school. I have also shown this on the map – people from this development will drive through Scholes Village and past the proposed Amazon site to access the M62 and M606.



In addition, as I have previously pointed out, the traffic assessments do not take into account:

- Any other significant building developments in Bradford, Calderdale and Leeds.
- The changes to the Chain Bar roundabout as part of Kirklees' plans for the A638 (including introduction of bus lanes).
- The change to the A58 to introduce traffic lights at the site entrance instead of a roundabout (against the advice from Kirklees Highways).
- The expected increase in traffic due to people returning to on-site work rather than working from home.
- The changes to traffic flows as a result of the Bradford Clean Air zone.

Fear and Intimidation:

Document 958911 para 2.3.50: This states that the majority of surrounding links are already in the category of extreme for fear and intimidation, due to traffic levels. I do not know the meaning of 'fear and intimidation' in this context but it does not seem right to increase traffic further if we are already living in a 'extreme' location. 2.3.51 states that the increase in traffic does not take the area into another bracket but I would question what other brackets there are beyond 'extreme'?

Buses:

Scholes Village suffers from a poor bus service, which was cut further in September 2022. This means that employees will be unlikely to be able to use public buses to get to the Amazon development and will have to use private cars or taxis. There is no need for additional bus stops to be built on Whitechapel Road as there are already bus stops within easy walking distance of the entrance – building more will simply create more environmental damage and clutter to the pavement and landscape. Document 958911 states at 2.3.15 that 'the Applicant has committed to providing private buses to transport a minimum of 150 staff to and from the Site during 'seasonal peak' operations'. Will these private buses only run during seasonal peak times and not all year round (as was previously understood to be the case)?

Whitechapel Road entrance:

It is astonishing that there is still an entrance on Whitechapel Road included in the plans as this goes against advice from Kirklees departments. The latest plans show that the morning shift will coincide exactly with the time that children walk to school and the time that local residents are trying to get to work.

The fact that the applicant has stated that this entrance will be used by HGVs in 'emergencies' begs the question as to what constitutes an emergency – the local roads, and Chain Bar roundabout in particular, are regularly clogged up with traffic, sometimes requiring local buses to redirect along Whitechapel Road – would this constitute an emergency? How would use of this entrance be policed?

The latest plans suggest that employees would have to use key fobs to enter the site – this would lead to large queues along Whitechapel Road in both directions, creating even more pollution and additional danger to the many children who walk to school along here, as well as delays to other local traffic.

Visual changes to Whitechapel Road:

The proposed additional tree planting is along the route of the high pressure gas pipe and would therefore presumably not be allowed, so should be completely discounted from the plans. The acoustic fence does not continue for long enough to provide protection to residents and walkers on Whitechapel Road or the neighbouring cemetery. The additional tree planting does nothing to improve the view of the development from the distance – the nature of the local landscape is such that there are far reaching views to and from the site in many directions, all of which will be spoilt if a large warehouse is built.

Construction phase:

The latest documents state that this has increased to 84 weeks. The working hours do not seem to have been reduced and at 7.30am – 6.30pm every weekday, with an additional 30 minutes either side allowed for moving equipment around, will cause a huge amount of stress and annoyance to local people. According to the figures, removal of topsoil alone will require 5000 HGV trips (each way). The construction traffic cannot be allowed to pass through Scholes Village at any stage – already it is difficult for children to cross Westfield Lane to get to school as no crossing patrol has

been provided for a number of years, and the centre of Scholes is usually only passable to traffic in one direction due to customer parking for the local shops.

Future success of the site:

I remain to be convinced that there will be a long term positive economic benefit from this development and as such local people should not suffer the environmental damage. Given the poor public transport service to Scholes Village mentioned above, as well as the already overloaded roads, the provision of high quality jobs within walking distance would be welcomed. However, there are already hundreds of local warehouse jobs advertised on Indeed, which suggests that there is not a need for this type of employment here. A survey of workers at existing industrial sites suggests that most people travel in from South Bradford, not Kirklees. Increasing local traffic will discourage other people from using shops and cafes in Scholes Village and Cleckheaton. The people working at the Amazon site won't have enough time during breaks to visit local businesses. Amazon have publicly declared that they are currently cutting jobs and are looking to use robots instead of people in their warehouses, so future job opportunities here are likely to be further reduced. I have a real concern that this monstrosity is built and is then empty and unused within years, with no way of reversing the environmental damage caused.

Contraventions to local plan:

I have raised these points previously but given that the latest plans have not addressed these points I feel it is necessary to raise them again. I cannot understand how the plans could be approved if the requirements of the local plan are not met.

The proposed development is not in accordance with the Local Plan strategy and policies for the following reasons:

1. It is larger than the developable area outlined in Local Plan ID ES6.
2. It does not enhance the character of the landscape (LP32).
3. It does not have high levels of sustainability (LP24).
4. It does not increase biodiversity (LP30).
5. It will have a detrimental impact on the local highway network (LP21).
6. It will increase flood risk elsewhere (LP27).
7. It will not enhance the water environment (LP34).
8. It does not support a skilled workforce (LP9).
9. Mitigation measures against poor air quality have not been included (LP47 and LP51).

In addition, it is in breach of the Environment Act, which makes it a legal requirement for the current and future governments to protect and improve our natural world.

Alternatives

The suggested development in the local plan (which showed a number of smaller units with more flexible use) included design elements which were far more sympathetic to the local landscape, the local ecology and to local residents, and could provide a greater range of skilled jobs. The development proposed by Amazon is completely different from that envisaged in the local plan and is looking to take far too much from this site, whilst giving almost nothing back. Please do not allow this to happen – our area will become an embarrassment to Kirklees and a place to be pitied.

I support all representations made by Save Our Spen.

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