

I wish to strongly object to plan Planning number 2021/62/92603/E

Please add this addendum to my previous more emotional objection ID 881942

Firstly let me say I am astounded that Kirklees changed this land to industrial use – this land could have quite easily been earmarked for environmental use for the future such as a solar farm

Mostly my objections will reference Kirklees own master planning policy

Kirklees Masterplan - Policy LP5 Masterplans must involve all the relevant stakeholders, including the council, landowners, developers, the local community, service providers and other interested parties.

There was no community engagement in fact the community was sidelined. I live on Whitechapel Road and I did not receive a leaflet from ISG , nor did I receive a personal invite as stated by FirstPlan as I am in fact a resident on Whitechapel road , or is ten houses distance from the development not in the catchment of circulation. I think this distribution is questionable that they delivered said leaflets to 7000 properties, and think we should be provided evidence that it actually occurred . I received information from word of mouth. I did not have chance to attend the Webinar , not that it seemed to matter , from what I gathered residents questions were not answered or even considered and they didn't have the right to voice their opinion . Was this just a box ticking exercise ? At what point did they consider residents that don't have online access.

Kirklees Masterplan - Masterplans will be expected to achieve the following (proportionate to the scale of development): a. an indicative development layout and phasing and implementation plan; b. high standards of design that respect the character of the landscape, heritage, adjacent and nearby settlements and built development, reflecting the urban to rural transition with appropriate boundary treatment;

There may indeed be a high standard of design in the proposed warehouse for it to fit into an industrial park or the side of the motorway BUT the images provided by ISG do not takes the local area into consideration , this is a semi-rural village with residential properties surrounding the proposed monolith . It is also proposed to be adjacent to a cemetery (affecting local residents peace and solitude when visiting graves of loved ones with noise from loading HGV , constant reversing alarms on forklifts and HGV, staff verbalizing their unhappiness at working for Amazon !)

Putting a couple of meters of trees in as a bund could take 30 years to mature to a height that will offset the visual disturbance of this warehouse as the warehouse is potentially 23 meters high. And 65000sqm ground floor plan so basically a huge box as high as Scholes church steeple and 8 football pitches in area. On top of the area of warehouse we must include the 865 car and 200 HGV parking and loading bays , in total covering an area of appx 60 acres (or 30 football pitches or 242000sqm) .

Firstplan - Planning statement excerpts (on behalf of ISG)

The full development proposals taken from First plan Planning statement on behalf of ISG The development proposals are for a 265,601 sqm Storage and Distribution unit (Use Class B8)

The building footprint is 64,521 and will deliver a Gross Internal Area (GIA) of 265,706 sqm, across ground plus three levels of mezzanine floor. The ancillary office space is located at the front (west) of the building, with the warehouse space to the rear.

The general parapet height of the building is 23.05m with stair cores / roof access facilities, two of which rise to 26.05m.

I have researched Birstall retail park itself is only 210000sqft or 19509 sqm (Birstall retail park would fit fit inside the new development 12.5 times)

This building in terms of scale would be the biggest in the whole of Kirklees (in one of the smallest villages in Kirkless) it will overpower any other buildings in the area and is opposite and adjacent to some ancient buildings and trees

Kirklees Masterplan - c. make effective use of the site through the application of appropriate densities in terms of scale, height and massing, and its relationship to adjoining buildings and landscape; d. create a strong sense of place, ensuring the proposed development makes a positive contribution to local character and distinctiveness;

Where is the strong sense of ' Place ' perhaps the warehouse "owners" the only intended recipient of this statement , as I do not think local residents will enjoy the strong sense of place of their own village when a large warehouse is dumped upon it affecting the current landscape . Where is the positive contribution ? are you positively creating an eyesore - YES , are you positively contributing to our air quality – NO , are you positively contributing to our Noise Pollution – NO . I don't see a positive contribution to the local character, not far from the intended development are ancient properties , what are the positives ??? Please enlighten me . This development is within a quarter mile of a conservation area in Scholes where you cannot so much as change your garden gate without planning permission. We shall see if the large US corporations planning is rejected or if they have a better standing in the community than the actual residents.

The building is planned to be covered in metal cladding, through shades of grey to white , I wonder if this type of material is chosen to fit into the current landscape , to fit into the agricultural and ancient feel of the village , OR is the material of the warehouse chosen for the benefit of the ' owners ' of the warehouse , to be as maintenance free as possible and keep their costs down ! The materials are suitable for a warehouse in an already existing industrial park but NOT in a semi rural landscape .

Kirklees Policy LP33 Trees The Council will not grant planning permission for developments which directly or indirectly threaten trees or woodlands of significant amenity. Proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment, including the Wildlife Habitat Network and green infrastructure networks. Proposals will need to comply with relevant national standards regarding the protection of trees in relation to design, demolition and construction. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme.

Firstplan planning report for ISG . There is a Tree Preservation Order (ref. 08/81) which applies to individual trees and two tree groups located within the southern part of the site.

Is it positively improving the character , or making a contribution to the natural habitat to chop down large mature trees close to the car entrance on Whitechapel road trees that make the road side an area of natural beauty . Trees that currently help wildlife birds and nature flourish , would Kirklees prefer traffic ? it seems so , the trees help our air quality and traffic kills it ...its not rocket science. We all know we need to try improve climate change . Kirklees plan seems to think we improve by bringing more traffic and more pollution and reduce green space.

I would like some clarity on the point of tree preservation orders if we only remove them once a corporation brings forward a planning application. I assume if we all start chopping our trees down in the area or our gardens that would be deemed unacceptable . But it is acceptable for a large corporation !!

The plans show a loss of several trees This could cause disruption to bat roosts and bat habitat areas Their flying patterns indicate an important habitat for these species. The submitted assessments do not clearly assess the impact of the proposed lighting on identified species such as bats.

The bird breeding surveys are inadequate and do not meet professional guidelines . One visit on a day when the weather conditions are not known is not sufficient to form an ecological appraisal of the species found on site.

NPPF states plans “should ‘promote the conservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity’.” The suggestion to mitigate this impact through an ‘offsite compensation scheme’ is not acceptable.

Kirklees Masterplan h. measures to mitigate the traffic impacts of the proposed development on the strategic and local road networks;

LP21 Highways and access Proposals shall demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals shall also consider any impacts on the Strategic Road Network. All proposals shall: a. ensure the safe and efficient flow of traffic within the development and on the surrounding highway network; b. where needed, provide new infrastructure or improvements on or off site to ensure safe access from the highway network for pedestrians, cyclists, public transport users and private vehicles; c. New development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe. on highway safety, air quality, noise and light restrictions; d. take into account changes in site levels and topography to ensure the development can be accessed easily and safely by all sections of the community and by different modes of transport;

Firstplan - Planning statement excerpts (on behalf of ISG)

The building is proposed to be served by 887 car parking spaces (which includes 44 disabled spaces) for staff and visitors. Out of this car parking provision, 88 spaces will have EV charging and 45 spaces will be allocated for motorcycle parking. These facilities are located to the west of the site in front of the building with some of this provision provided within the partially decked car park. 3.10 The service yard wraps around the rear of the building, to the north, east and south. This includes 191 HGV parking spaces (which includes 10 spaces for HGV EV charging), in addition to 20 HGV queuing spaces up to the security gate. 6 van docks are provided. The development will also provide 60 HGV loading docks from the warehouse, with these located on the north, east and southern elevations of the building.

This will be the biggest building in the whole of Kirklees bigger than whole of Birstall retail park combined , ISG First plan document it states at least 75% of people will travel in a car to work 1500*.75 is 1125 extra cars on Whitechapel road plus the extra 200 from the new housing development .

The new warehouse development has parking for 887 cars and 200 HGV and 20 HGV queuing spaces and reports say there will be no adverse traffic impact in a small residential area ! Even getting to the car parking and HGV parking is a vast increase in traffic . Never mind the movements in and out of the facility by the HGV once they are fully loaded .

Does this forecast from First plan (below)meet the acceptable traffic from Kirklees Local Plan (and this is only 12 HOURS PER DAY Not the 24 hour a day operation that this warehouse is deemed to be .

Firstplan - Planning statement excerpts (on behalf of ISG)

- 5.8 The shift patterns which the intended occupier will operate will result in workers leaving the site between 0500-0600, arriving at the site between 0700-0800 and a full shift changeover between 1800-1900. Therefore, these are the peak hours of the end user. However, it is only considered necessary to examine the peak period trip attraction given that this is when traffic will be highest on the local and strategic highway network. This is consistent with the approach undertaken on similar schemes and accepted. Combined with the forecast operational traffic (HGVs), the anticipated trip attraction of the intended occupier is presented in **Table 5.2**.

Table 5.2 – Intended Occupier Forecast Vehicle Trip Attraction (Census Modal Split)

| | Cars | | | HGVs | | | Total | | |
|--------------|------------|------------|--------------|------------|------------|------------|--------------|--------------|--------------|
| | Arr. | Dep. | Two-way | Arr. | Dep. | Two-way | Arr. | Dep. | Two-way |
| 0700-0800 | 440 | 0 | 440 | 13 | 5 | 18 | 453 | 5 | 458 |
| 0800-0900 | 0 | 0 | 0 | 11 | 9 | 20 | 11 | 9 | 20 |
| 0900-1000 | 0 | 0 | 0 | 16 | 13 | 29 | 16 | 13 | 29 |
| 1600-1700 | 0 | 0 | 0 | 8 | 18 | 26 | 8 | 18 | 26 |
| 1700-1800 | 0 | 0 | 0 | 13 | 20 | 33 | 13 | 20 | 33 |
| 1800-1900 | 440 | 440 | 881 | 9 | 20 | 29 | 449 | 460 | 910 |
| Daily | 880 | 880 | 1,761 | 215 | 335 | 550 | 1,108 | 1,228 | 2,335 |

I also disagree with Firstplan assessment of HGV movements If we do simple maths using the data provided Firstplan states potential 60 loading bays , industry standard is one hour to load one HGV one in one out over 24 hours would be 60*2*24 appx 2880 HGV in and out of A58 onto chain bar each

day . NOT the 550 HGV on the Firstplan document. HOWEVER if we actually look at the drawings there seems t be more like 94-96 loading bays not the 60 mentioned by Firstplan.

The car status might be more accurate that there will be 1761 extra cars on top of the USUAL volume of traffic (outside of COVID to reflect accuracy)

Kirklees Local plan accepted movements is 302 HGV and 1218 cars onto the original plan of a mixed uses site on the north side of the developable land all of these movements were onto the A58 not onto the residential area of Whitechapel road.

BUT to counteract resident health, the warehouse MIGHT pay a rate bill which can offset the increased healthcare costs from pollution and traffic accidents.

Jobs

The applicant for this development is ISG Retail but are they the end user ?. It is ISG Retail who are making the claim of 1500 jobs. If Amazon do eventually become the end user of this development, they will not be bound to the figure of 1500 jobs this could be lessened with increasing automated processes . Kirklees will have to enter into negotiations and by then it will be too late to hold the developers to their promises.

The proposed site is next to a cycle network and if these jobs were to go to local people as the planners suggest which is there 88 bicycle parking places as opposed to 887 car parking places it should be 15% . No internal showers are shown in the plans which would suggest they are not promoting cycle use .

Kirklees Local Plan - Policy LP52 Protection and improvement of environmental quality Proposals which have the potential to increase pollution from noise, vibration, light, dust, odour, shadow flicker, chemicals and other forms of pollution or to increase pollution to soil or where environmentally sensitive development would be subject to significant levels of pollution, must be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the pollution, so as to ensure it does not reduce the quality of life and well-being of people to an unacceptable level or have unacceptable impacts on the environment. Such developments which cannot incorporate suitable and sustainable mitigation measures which reduce pollution levels to an acceptable level to protect the quality of life and well-being of people or protect the environment will not be permitted. Where possible, all new development should improve the existing environment

I have yet to see a report from the proposed warehouse that “measures have been incorporated to prevent or reduce the pollution” at this point we already have air , noise and light pollution , how in fact is the developer planning to REDUCE the pollution ? What mitigation is in place for the developer to reduce pollution in this area ? How is this achieved ? From my evaluation the developer is increasing pollution . How is constant light, noise and air pollution improving the current residents quality of life and well being ? I am yet to understand

Kirklees Local Plan Policy LP51 Protection and improvement of local air quality 1. Development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air

pollution which would have an unacceptable impact on the natural and built environment or to people. 2. Proposals that have the potential to increase local air pollution either individually or cumulatively must be accompanied by evidence to show that the impact of the development has been assessed in accordance with the relevant guidance. Development which has the potential to cause levels of local air pollution to increase must incorporate sustainable mitigation measures that reduce the level of this impact. If sustainable measures cannot be introduced the development will not be permitted. 3. Where the development introduces new receptors into Air Quality Management Areas or Areas of Concern or near other areas of relatively poor air quality, for example near roads or junctions, the development must incorporate sustainable mitigation measures that protect the new receptors from unacceptable levels of air pollution. Where sustainable mitigation measures cannot be introduced which prevent receptors from being exposed to unsafe levels of air pollution, development will not be permitted.

I dispute the calculations of first plan to the amounts of traffic and queuing traffic caused by HGV movement . There should be a more accurate report on traffic , made when we are out of the pandemic , I noticed ISG traffic report was conducted in 2020 when most of the country was in lock down or working from home. This needs revisiting when the country is fully back to normal status , most people are still working from home even in summer 2021. This will probably not go back to usual volumes until at least autumn 2021.

Basic calculation as above using industry standards and based on the number of loading bays is $60 \times 2 \times 24$ appx 2880 HGV movements per day.

I assume all the extra cars and extra HGV in that one area around chain bar and Whitechapel road will affect our air pollution , and could in fact create a new AIR QUALITY MANAGEMENT AREA , which is in full contradiction of Kirklees own Strategic Air Quality management plan –

Which states : Poor Air Quality is the largest Environmental risk to public health in the UK

1 in 20 deaths are attributable to pollution

The biggest source of air pollution is road traffic

70% of traffic pollution comes from Diesel vehicles

High risk groups Pregnant Women, infants , children ,elderly

Planning – Site and design to reduce motorized travel !!!! all from Kirklees own website

Increased HGV movements and car movements will not only affect our air pollution but will also affect our noise pollution. Whitechapel road is a main artery through Scholes village , most properties in the village run along the main artery , already constant traffic noise the are usually quiet times after 9pm and until 6am when we get some small amount of respite . I assume this respite time will no longer exist with the warehouse being a 24 hour a day operation . We will hear lorries rumbling through the area of the warehouse 24 hours a day . This site has the car entrance on Whitechapel Road which will mean traffic will have to travel UP or DOWN a road that is already limited by cars that park on the road as people do not have driveways.

HGVs that arrive too early for their allocated parking spot will park in local streets away from the site but close enough to get to the site once their slot is available, as the site has queuing for only 20 HGV this will mean local roads being clogged with HGV will adversely affect traffic and safety in the surrounding area. The risks associated with vehicle movements have been glossed over in the submitted assessments.

Kirklees Local Plan - Policy LP24 Design Good design should be at the core of all proposals in the district and should be considered at the outset of the development process, ensuring that design forms part of pre-application consultation of a proposal. Development briefs, design codes and masterplans should be used to secure high quality, green, accessible, inclusive and safe design, where applicable. Where appropriate and in agreement with the developer schemes will be submitted for design review. Proposals should promote good design by ensuring: a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape; b. they provide a high standard of amenity for future and neighbouring occupiers; including maintaining appropriate distances between buildings and the creation of development-free buffer zones between housing and employment uses incorporating means of screening where necessary; c. extensions are subservient to the original building, are in keeping with the existing buildings in terms of scale, materials and details and minimise impact on residential amenity of future and neighbouring occupiers; d. high levels of sustainability, to a degree proportionate to the proposal, through: i. The re-use and adaptation of existing buildings, where practicable; ii. design that promotes behavioural change, promoting walkable neighbourhoods

As Per policy LP24 – I have no doubt this warehouse is a ‘ good design ‘ but it does contradict the ‘form being a grey metal clad box the ‘ that respects and enhances the character of the townscape, heritage assets and landscape ‘ . Where is that in these proposals ? a grey metal clad box the size or 8 football pitches surrounding by a car and HGV parking the size of 60 football pitches does not seem to ENHANCE or RESPECT the character of Scholes village and its surrounding landscape . Also as per LP24 new building should be in ‘ Keeping with existing buildings in terms of scale ‘What other buildings are in Scholes village are of similar proportions ? I would say NONE, even the newly built school could fit inside this warehouse building 27 times.

The plans also mention ‘ moving a heritage trail ‘ . Does that not contradict it having heritage trail status ? If we simply move it does it just then become another, track , path ? or pavement ?

Other planning LP21 Highways and access Proposals

Within 1 quarter mile of the proposed warehouse development, Kirklees have already approved a housing development on Whitechapel Road for 122 houses that is due to start soon . This development will potentially mean an extra 244+ extra cars on an already busy route with no improvements to the current infrastructure . Whitechapel road is currently full of pot holes and a disgraceful state in some places that has been like that for a long time . It has traffic calming measures that have no impact on traffic calming , as all they seem to do is encourage drives to go over them over the speed limit and cause more clattering noise when the car goes over it . If we increase the level of traffic to an extra 900+ cars for the warehouse movements daily and potentially 244 cars for the housing development

there will be no let upAs Whitechapel road has a long clear run , people often travel down this road at speed and overtake cars travelling at the speed limit .

Kirklees Local Plan -Policy LP47 Healthy, active and safe lifestyles....., f. supporting energy efficient design and location of development; g. ensuring that the current air quality in the district is monitored and maintained and, where required, appropriate mitigation measures included as part of new development proposals; h. creating high-quality and inclusive environments incorporating active design and the creation of safe, accessible and green environments which minimise and mitigate against potential harm from risks such as pollution and other environmental hazards;

Promote development that helps to reduce and mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced and to help the transition towards a low carbon economy.

How is this warehouse energy efficient ? its size in the first instance determines that it will probably consume more energy than scholes village in its entirety . It is going to be a 24 hour a day operation , floodlit over the 60 acre area , besides detrimentally affecting the wildlife and nocturnal creatures this will affect location residents .

Kirklees Local Plan - Policy LP26 Renewable and low carbon energy Renewable and low carbon energy proposals (excluding wind) will be supported and planning permission granted where the following criteria are met: a. the proposal would not have an unacceptable impact on landscape character and visual appearance of the local area, including the urban environment; b. the proposal would not have either individually or cumulatively an unacceptable impact on protected species, designated sites of importance for biodiversity or heritage assets; c. the statutory protection of any area would not be compromised by the development; d. any noise, odour, traffic or other impact of development is mitigated so as not to cause unacceptable detriment to local amenity; e. any significant adverse effects of the proposal are mitigated by wider environmental, social and economic benefits. Where the above criteria are met, the council encourages dialogue with local community groups promoting community renewable and low carbon energy schemes

If you were actually considering future use and the climate and energy efficiency you would be changing this land into a SOLAR FARM , good for the environment, can still have natural habitat remains biodiverse , can keep TPO trees , creates revenue , NO pollution in the AIR ,NOISE or LIGHT and helps the environment by limiting the use of fossil fuels . Ideally located as it is not shadowed by other buildings , so can collect all the sunlight possible . ALL IN LINE WITH YOUR OWN POLICIES . Please take you head out of the sand and actually read your own policies and stand by them , instead of thinking about the revenue from business rates , because if we look at this development truly that is the ONE and ONLY benefit (If they actually pay any rates and don't sue the council for damages)

Kirklees Local Plan Policy

- ***Avoiding allocating land where possible in the areas at highest risk of flooding Avoiding the best and most versatile agricultural land where possible Protect and enhance the characteristics of***

the built, natural and historic environment By avoiding allocating land which would significantly harm these assets- *Why in that case did Kirklees allocated green belt land to industrial usage in the first instance*

- Strengthen the role of town centres - *An Amazon Warehouse DOES NOT strengthen the role of town centers it basically kills them by turning us into a less sustainable and a more throw away society . All it does is encourages people away from the high st .*
- Promote the re-use of existing buildings and the use of brownfield land to meet development- *If this is truly Kirklees Policy WHY did you make a 60 acre Greenbelt area into a 60 acre Industrial area – ripe for a development of this magnitude.*
- Noise and air quality issues associated with motorway around Cleckheaton, Birkenshaw, Gomersal, Birstall and Oakenshaw. *Again if this is Kirklees policy and you already know there is noise and air quality issues around Cleckheaton , Why would you introduce MORE noise and air quality issues*

All the comments above and this planning proposal in its entirety is totally against the agreed local plan. The Local plan should be the council's stated position and it is not reasonable to deviate so much from the local plan.

I fully Support Save our Spen

360 Whitechapel Road

Scholes

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