

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: 1.1	Consultee: 942501	unknown	Agent: 962102	Robert Deanwood	Rep ID: PDLP_AD3155
Council Response	No changeNational Grid have no comments to make.				
Paragraph/Site: 1.1	Consultee: 943459	Mr Anthony Northcote	Agent:		Rep ID: PDLP_AD939
Council Response	Support allocations in the plan.				
Paragraph/Site: 1.2	Consultee: 1048118	mr christopher ridsdale	Agent:		Rep ID: PDLP_AD284
Soundness - Effective	Local infrastructures cannot support the proposed level of development				
Council Response	No ChangeThe Kirklees Local Plan is supported by an infrastructure delivery plan. The cumulative impact of traffic generated by development has been assessed through the Traffic Modelling. Where specific infrastructure/mitigation is required this has been identified within the site allocation text.				
Paragraph/Site: 1.3	Consultee: 1048055	mr paul wright	Agent:		Rep ID: PDLP_AD272
Soundness - Justified	- More housing development in the HD3 area of Huddersfield, this is simply unsustainable and unnecessary. - This area has suffered far more than its fair share of new housing , putting a huge strain on local infrastructure, i.e roads ,schools,doctors etc. - Haughs Road area of Quarmby is deemed to be a conservation area, housing scheme given outline planning permission because of lack of a local housing plan - Developers are applying for planning on any unsuitable piece of green space in the knowledge that the council has no grounds to reject it for fear of losing on appeal and incurring costs, this is simply unfair on residents living within the vicinity of these areas.				
Council Response	This relates to a previous planning application. However, it shows the Council's intent to have a Local Plan in place.				
Paragraph/Site: 1.4	Consultee: 943612	Helen France	Agent:		Rep ID: PDLP_AD2061
Legally Compliant	Local plan has failed to engage the community from the start of the process. The entire information and communication strategy around the development of this Plan has been so 'low key' as to have been invisible to most of the population				
Soundness - Positively Prepared	- Massive number and scale of development in unsustainable locations - Housing provision of 5,500 in Kirklees Rural is totally against the vision and objectives of the local plan - Concerned with preserving the green belt. Proposed land allocations flout and fail to comply with these requirements - Local plan will not contribute to sustainable development				
Soundness - Justified	Insufficient infrastructure to support the large scale increase in population Lack of objectively assessed need and assessment of the impact of proposed developments on the area to determine that benefits really do outweigh adverse impacts Safeguarded land does not appear to have been objectively assessed at all Developments proposed in areas of flood risk. There are sequentially preferable sites- Impact upon the natural environment and heritage assets Increased noise and air pollution Road infrastructure is too constricted and narrow leading to an increased risk of public safety Impact on agricultural land Impact on UK BAP Priority Habitats Development being proposed in high coal risk areas Impact upon conservation areas and local heritage assets The local plan show little understanding for the real housing need of the area Little real understanding of the business needs of the wider area and cooperation with other adjoining Local Authorities to the Dearne Valley				
Soundness - Effective	The local plan is unrealistic and undeliverable				
Soundness - Consistent with National Policy	- Local plan is inconsistent with or directly contravenes National Policy, in particular: paragraph 7 sustainability; paragraph 14 objectively assessed needs and impact upon the area; paragraph 17, the plan fails the 12 core principles; paragraphs 79, 80, 82 and 84 preserving the green belt; paragraph 100 development in areas of flood risk; paragraph 101 sequential test for sites at less flood risk; paragraph109 impact upon the natural environment; paragraph 110 minimisation of pollution and other adverse effects; paragraph 112 impact upon agricultural land; paragraphs 114 and 119 impact upon UK BAP Priority Habitats; paragraphs 120 and 121 impact upon high risk coal areas; paragraph 126 impact upon conservation areas and heritage assets; paragraphs150-152 the local plan does not reflect the visions or aspirations of the local community; paragraphs 158-159 local plan does not show sufficient understanding of the real housing need in the area; paragraphs 160 and 178-179 there appears to be little real understanding of the business needs of the wider area and cooperation with other adjoining Local Authorities to the Dearne Valley; paragraph 182 the plan is not sound because it is unrealistic and undeliverable				

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	having been based on less than robust and credible evidence.
Proposed Change Requested	- A Plan based on what can realistically be delivered in 15 years, regularly reviewed say every 5 years, would probably be far more workable
Council Response	No change. The suitability of the Kirklees Rural area to accommodate development is considered in Section 5.4 of SD1, which looks at the strengths / opportunities for and challenges to growth. This approach takes account of the vision (4.2 in SD1) for development to take place in a sustainable way; and retaining and enhancing character while creating opportunities to build thriving communities which respond to local needs. BP11 – the Infrastructure Technical Paper sets out how the Local Plan has considered infrastructure issues. LE40 and LE41 – the Infrastructure Delivery Plan and addendum provide evidence of infrastructure requirements over the plan period. Sites have been assessed in accordance with BP23 – Local Plan Methodology part 2. All of the sites have been assessed following advice from specific consultees on issues including transport, flood risk and drainage, environmental health, biodiversity, historic environment, open space, education, green belt, public health and other potential constraints. SD22 Employment Technical Paper provides an overview of the different requirements for employment land across the district. SD19 Green Belt Review considers the role and function of the green belt in the district. NPPF, in para 157, states Local Plans should be drawn up over an appropriate time scale, preferably 15 years.

Paragraph/Site: 1.8	Consultee: 943076	Mr Jason McCartney MP	Agent:	Rep ID: PDLP_AD3689
Soundness - Justified	I have submitted individual comments on individual sites. Overall the plan is not technically sound as these sites cannot provide sustainable development. Local employment opportunities, education facilities and access to health and dental care are not adequately provided for upon the population increases. The impact of increased noise and air pollution is not adequately address. The plan does not guarantee safe and effective transport networks. The plan will degrade the character and quality of the landscape e.g. Lindley Moor. The plan is not sound.			
Proposed Change Requested	Needs to demonstrate sustainability: infrastructure, transport, flooding, health and dental care, environment, local employment, education, air quality, right kind of housing.			
Council Response	No change.Your previous site comments on the plan have been taken into account and responses are set out in the Council's Statement of Pre-Submission Consultation (Nov 2016).Full consideration of the likely impacts of the Local Plan's strategy, policies and individual site allocations has been considered as part of the Sustainability Appraisal, Settlement Appraisals and a wider consideration of infrastructure planning impacts, such as roads, schools and other infrastructure. This is set out in the Local Plan evidence base. The council has considered all the relevant site options which have been submitted into the process in accordance with the published site selection methodology.			

Paragraph/Site: 2.1	Consultee: 943894	Mrs Beverley Lambert	Agent:	Rep ID: PDLP_AD2350
Council Response	No change required - support noted.			

Paragraph/Site: 2.1	Consultee: 978506	Cllr Nigel Patrick	Agent:	Rep ID: PDLP_AD2936
Soundness - Justified	The emphasis of the Local Plan is to concentrate employment opportunities in Huddersfield and north Kirklees, leaving rural south Kirklees with a net reduction in employment land and a net increase in the number of dwellings, with some of the existing employment sites lost to housing. It is important for the future of a town that the employment opportunities are enabled to grow not forced to contract. The plan will in effect restrict growth in this rural area and that directly contradicts the NPPF which encourages economic growth in rural areas. It also contradicts policies in the Local Plan which seek to increase local employment opportunities (DLP 10, 1(C)) and to protect existing/ productive employment land.			
Proposed Change Requested	Protect existing employment sites within the Holme Valley and not allocate them for housing.			
Council Response	No change.Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and reflecting green belt purposes.Existing employment areas have been retained, to enable jobs to be provided in locations which are close to residential areas and reasonably accessible by public transport and to relieve the pressure to replace existing employment with housing. Locations with concentrations of business uses which constitute the main employment areas in Kirklees outside town centres, taking into account both scale and location, have been identified as Priority Employment Areas (PEAs), these are shown on the Policies map (SD3) and listed in the Strategy & Policies document (SD1). These areas will be safeguarded for continued employment use.28 PEA's have been designated in the Kirklees Rural area, please see the PEA's Methodology Paper for more information (BP8).			

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: 2.1	Consultee: 1050803	Cllr Kenneth Sims	Agent:	Rep ID: PDLP_AD3684
Soundness - Justified	The emphasis of the Local Plan is to concentrate employment opportunities in Huddersfield and north Kirklees, leaving rural south Kirklees with a net reduction in employment land and a net increase in the number of dwellings, with some of the existing employment sites lost to housing. It is important for the future of a town that the employment opportunities are enabled to grow not forced to contract. The plan will in effect restrict growth in this rural area and that directly contradicts the NPPF which encourages economic growth in rural areas. It also contradicts policies in the Local Plan which seek to increase local employment opportunities (DLP 10, 1(C)) and to protect existing/ productive employment land.			
Proposed Change Requested	Protect existing employment sites within the Holme Valley and not allocate them for housing.			
Council Response	No change. Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and reflecting green belt purposes. Existing employment areas have been retained, to enable jobs to be provided in locations which are close to residential areas and reasonably accessible by public transport and to relieve the pressure to replace existing employment with housing. Locations with concentrations of business uses which constitute the main employment areas in Kirklees outside town centres, taking into account both scale and location, have been identified as Priority Employment Areas (PEAs), these are shown on the Policies map (SD3) and listed in the Strategy & Policies document (SD1). These areas will be safeguarded for continued employment use. 28 PEA's have been designated in the Kirklees Rural area, please see the PEA's Methodology Paper for more information (BP8).			

Paragraph/Site: 2.1	Consultee: 1050805	Cllr Donald Firth	Agent:	Rep ID: PDLP_AD3683
Soundness - Justified	The emphasis of the Local Plan is to concentrate employment opportunities in Huddersfield and north Kirklees, leaving rural south Kirklees with a net reduction in employment land and a net increase in the number of dwellings, with some of the existing employment sites lost to housing. It is important for the future of a town that the employment opportunities are enabled to grow not forced to contract. The plan will in effect restrict growth in this rural area and that directly contradicts the NPPF which encourages economic growth in rural areas. It also contradicts policies in the Local Plan which seek to increase local employment opportunities (DLP 10, 1(C)) and to protect existing/ productive employment land.			
Proposed Change Requested	Protect existing employment sites within the Holme Valley and not allocate them for housing.			
Council Response	No change. Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and reflecting green belt purposes. Existing employment areas have been retained, to enable jobs to be provided in locations which are close to residential areas and reasonably accessible by public transport and to relieve the pressure to replace existing employment with housing. Locations with concentrations of business uses which constitute the main employment areas in Kirklees outside town centres, taking into account both scale and location, have been identified as Priority Employment Areas (PEAs), these are shown on the Policies map (SD3) and listed in the Strategy & Policies document (SD1). These areas will be safeguarded for continued employment use. 28 PEA's have been designated in the Kirklees Rural area, please see the PEA's Methodology Paper for more information (BP8).			

Paragraph/Site: E1837	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3695
Council Response	No change required, support for this allocation noted.			

Paragraph/Site: E1879	Consultee: 943957	Mr Ian Smith	Agent:	Rep ID: PDLP_AD3696
Council Response	No change required, support for this allocation noted.			

Paragraph/Site: E1873	Consultee: 968497	Erica Amende	Agent:	Rep ID: PDLP_AD512
Soundness - Justified	The Local Plan is unsound by reason of conflict with national policy and the protection of heritage. The proposal will impact upon Nunn Wood, Kirklees Hall and the historic value of the area as described by the Brontes.			
Proposed Change Requested	Delete allocation E1873 from the Plan and focus on urban regeneration, site assembly and the wider distribution of employment land should be substituted.			
Council Response	No change required - Site is an existing UDP business and industry allocation. No significant site constraints have been identified. Site is located within an			

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existing business and industrial area and has good access to junction 27 of the M62. Both English Heritage and Kirklees Conservation & Design Team have been consulted and raise no objections to the proposed allocation.

Paragraph/Site: **E1873**

Consultee: **978303 Cllr Andrew Palfreeman**

Agent:

Rep ID: **PDLP_AD2521**

Council Response

SUPPORT - No change required, support for the allocation of employment site E1873 noted.

Paragraph/Site: **E1831**

Consultee: **942768 Mr Andrew Wood**

Agent:

Rep ID: **PDLP_AD1770**

Soundness - Justified

This site is well screened and makes a low contribution to the green belt. Adjacent farmland to the west is very important for breathing space between Scholes, M62 and Cleckheaton, so any impact on this needs to be avoided.

Proposed Change Requested

Any impact on adjacent farmland to west should be avoided as it is very important for breathing space between Scholes, M62 and Cleckheaton.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. The site promoter has supplied a landscape assessment of the site and proposed mitigation to off-set the impact from development. Final details would be agreed and secured through the planning application process. This will also include the need for the appropriate design, layout and landscaping of the development to mitigate any potential impact on nearby residential areas.

Paragraph/Site: **E1831**

Consultee: **946178 Caroline Duff**

Agent:

Rep ID: **PDLP_AD1396**

Soundness - Justified

It appals me that it is proposed to build on green belt land adjacent to A58 and Cleckheaton New Cemetery where access roads are limited and some such as Whitechapel Road are congested at peak times even now. There are sites on Westgate previously used for this type of building and that are not in use at the moment. They would seem to be far more suitable. It does not seem that proper consideration has been given to what has been suggested.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted.

Paragraph/Site: **E1831**

Consultee: **954036 Mrs Jane Terry**

Agent:

Rep ID: **PDLP_AD499**

Soundness - Positively Prepared

Local residents have not been notified correctly. People who live adjacent to the site have not been informed in writing re the changes and therefore do not meet the information set out by the government about changing green land to building land. The plan does not meet the legal requirement to change the status of this land from its green belt status as it meets none of the criteria. Consideration has not been made to the existing buildings on the site. There are many alternative sites to this protected green belt land. The council should be encouraging development on brownfield sites and derelict land of which there are already many in the Spen Valley. Green belt land should remain as green belt.

Soundness - Justified

Location The site is adjacent to the local cemetery, which is well used and well loved, that one fact should make this proposal invalid. The site is a natural barrier between the town of Cleckheaton and Bradford and prevents the urban sprawl we have seen in so many other places. Access: Both the A58 and Whitechapel Road are busy often subject to speeding traffic. If access was given via the A58 this would contribute to the already choked chain bar. Whitechapel Road is used by lot of pedestrians and cyclists many who use to get to the local schools and is not suitable for access. Local Wildlife: There are foxes, bats, rabbits, and other unseen wildlife that resides in this area and their natural habitat should be protected. The site is near to a Wildlife Habitat

Network and known archeological sites. Pollution: Building industrial units on this land would potentially cause noise, light, odour and waste nuisance to local residents and the wider community.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. Site falls within flood zone 1 and is therefore not considered to be at significant risk of flood, however, surface water flooding has been noted. Site promoter has supplied a flood and drainage report. Swales are proposed to control surface water discharge. The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality. Pollutant levels in close proximity to this site have never been, nor currently exceed health related pollutant objectives. Most of the site falls within an outer hazard zone. A small part of the site is affected by the route of a high pressure gas pipeline. Appropriate layout will mitigate this constraint. Site promoter has supplied a noise and odour survey which has concluded there to be no significant constraints and appropriate mitigation measure can be put in place. Objection of proposed development on trees and wildlife have been noted. Technical assessment concludes there to be no significant impact and developer has provided a masterplan indicating the inclusion of the TPO's within the design of the employment site. No objection from English Heritage and Conservation and Design. WYASS confirms there to be an area of potential archaeological interest and recommend predetermination desk-based assessment & possible evaluation. An archaeological evaluation has been carried out by the site promoter which confirms there is low potential for archaeological remains. However, a geophysical survey is recommended to determine the potential for buried heritage assets. Spen Valley Greenway is to be connected via pedestrian and cycle links to be included within the site and along Whitehall Road. The site promoter has supplied a landscape assessment of the site and proposed mitigation to off-set the impact from development. Final details would be agreed and secured through the planning application process. This will also include the need for the appropriate design, layout and landscaping of the development to mitigate any potential impact on nearby residential areas. The design and layout of the site will take account of any constraints on the site such as high pressure gas mains and mining legacy.

Paragraph/Site: **E1831**

Consultee: **955742 Dr Eric Dyson**

Agent:

Rep ID: **PDLP_AD1178**

Soundness - Justified

Land forms a green lung separating Kirklees from Bradford. Footpaths that form part of the Spen Heritage trail cross the site. Industrial development on this site is inappropriate due to close proximity of the cemetery. Traffic congestion will increase, especially along Whitechapel Road. Whitechapel road is of restricted width.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. One of the purposes of the green belt is to prevent the merger of settlements and removal of this site from the green belt has significantly reduced the size of the strategic gap between Scholes and Cleckheaton, however the land between the site and Whitechapel Grove prevents the physical merger of the two settlements. The land stretches between Whitechapel Road to the south, the M62 to the east and the A58 to the north and is not therefore seen as part of the wider countryside. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required. The connecting links assessment which considers the impact of the development on the local road

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. Spen Valley Greenway runs to the north east of site boundary. A combined Cycle/Footway would be required long the site frontage on Whitehall Road to tie into Spen Valley Greenway. A dedicated link to Spen Valley Greenway from inside site would also need to be provided so as to avoid A58.

Paragraph/Site: **E1831**

Consultee: **959981**

Mrs Sharon Lewis

Agent:

Rep ID: **PDLP_AD2465**

Soundness - Justified

The Noise Survey and Assessment is unsound. Using the fact that the noise levels are already above those mentioned in the World Health Organisation as a reason to state that a development of this nature would have no impact on the residents of Whitechapel Road is totally unacceptable. This Transport Statement is unsound. It states increased traffic flow of approximately 600 vehicles per hour can be expected from this development, how can this not have a material impact? Chain Bar is already severely congested and an increasing number of vehicles using surrounding roads to avoid Chain Bar

Proposed Change Requested

There is no way of knowing what the units closest to Whitehall Road will be. If these units were only occupied by businesses that would have no impact of the noise levels, how would this be enforced?

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. A Noise Assessment would be required to be submitted as part of any planning application received on the site. Policy PLP52 of the Local Plan states that any planning application must be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the noise 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.

Paragraph/Site: **E1831**

Consultee: **961855**

Colin Berry

Agent:

Rep ID: **PDLP_AD696**

Soundness - Positively Prepared

- Representations made at the draft local plan stage have been ignored

Soundness - Justified

Different green belt assessment outcome for rejected site MX1927 - on the exact same site - to accepted option E1831. Assessment has clearly been adapted to suit outcome. Part of site will be visible for miles resulting in a significant negative impact upon the setting of Scholes conservation area. Access to the site from Whitechapel Road is inappropriate. Introduction of industry in a residential area is inappropriate. Land is good quality agricultural land and used for agriculture

Soundness - Consistent with National Policy

- Impact upon the green belt, in particular the impact upon the strategic gap between Scholes and Cleckheaton

Proposed Change Requested

Reduce the size of the overall development site by restricting it to the sloping land located from the highest point down to the main Whitehall road (A58), and the planting of a tree buffer on the skyline.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. The method of applying a green belt 'RAG' rating for the purposes of the site allocation methodology is set out in paragraphs 4.50 to 4.54 of the 'Kirklees Local Plan Methodology Part 2: Site Allocation Methodology' document. The overall site assessment looked at the site's configuration and location relative to the settlement and the impact release of the site would have on the role and function of the green belt. Assessment of the site included its configuration as well as the ability to create a strong new defensible green belt boundary. MX1927 is very poorly configured in relation to adjacent land, particularly between the site and land north of The Royds. As presented MX1927 would not result in a strong and defensible new green belt boundary and

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

would require a significant amount of additional land to be removed from the green belt in order to create a new green belt boundary for the Local Plan. One of the purposes of the green belt is to prevent the merger of settlements and removal of this site from the green belt has significantly reduced the size of the strategic gap between Scholes and Cleckheaton, however the land between the site and Whitechapel Grove prevents the physical merger of the two settlements. The land stretches between Whitechapel Road to the south, the M62 to the east and the A58 to the north and is not therefore seen as part of the wider countryside. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required.. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. The site promoter has supplied a landscape assessment of the site and proposed mitigation to off-set the impact from development. Final details would be agreed and secured through the planning application process. This will also include the need for the appropriate design, layout and landscaping of the development to mitigate any potential impact on nearby residential areas. No objection from English Heritage and Conservation and Design. WYASS confirms there to be an area of potential archaeological interest and recommend predetermination desk-based assessment & possible evaluation. An archaeological evaluation has been carried out by the site promoter which confirms there is low potential for archaeological remains. However, a geophysical survey is recommended to determine the potential for buried heritage assets.

Paragraph/Site: **E1831**

Consultee: **1034731 MR IAN ABBOTT**

Agent:

Rep ID: **PDLP_AD94**

Soundness - Justified

The proposal will not achieve the economic, environmental and social objectives of sustainable development. The number of constraints identified make it clear this land is unsuitable for employment. Major redevelopment work being carried out to the neighbouring motorway junction (j36) will not cater for the addition traffic. This junction and the roads connecting to it are already over congested. Additional traffic will impact greatly on traffic congestion and on environmental and health issues. This development along with nearby housing developments will leave the locality gridlocked. The local schools cannot support any dramatic increases in pupil numbers. The plan to use this green field site is non sensible and would have a damaging effect on the local community.

Proposed Change Requested

Remove this employment allocation. Use land more suitable for industrial development off the M606 motorway. There are currently several light industrial buildings laying unused within the area which should be used first.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required.. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality. Pollutant levels in close proximity to this site have never been, nor currently exceed health related pollutant objectives.

Paragraph/Site: **E1831**

Consultee: **1045990 Cllr Kath Pinnock**

Agent:

Rep ID: **PDLP_AD1985**

Soundness - Justified

Impact on air quality. Increase in traffic congestion. It seems odd that the comments in relation to traffic which are to be found under Housing site H69 have not been applied here. The proximity of the site to houses on Whitechapel Road would make it desirable to restrict or remove access via Whitechapel Road, OR put a large buffer zone at this end of the allocation.

Council Response

No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

(November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality. Pollutant levels in close proximity to this site have never been, nor currently exceed health related pollutant objectives.

Paragraph/Site: **E1831**

Consultee: **1049344 Mrs Karen Cogan**

Agent:

Rep ID: **PDLP_AD506**

Soundness - Positively Prepared The land is green belt and should remain so. It is also a buffer between local housing and the motorway and helps to keep noise down. There is plenty of land in Cleckheaton that is currently derelict and could be used for industrial units.

Soundness - Justified Access to the site with a school so close by would be an issue. Whitechapel road is not the easiest road to drive through at the best of times and with numerous children from both the primary and secondary schools using that road to walk to and from home. Traffic should also be considered as it's currently a nightmare to get into or out of Cleckheaton during the rush hour.

Council Response No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. One of the purposes of the green belt is to prevent the merger of settlements and removal of this site from the green belt has significantly reduced the size of the strategic gap between Scholes and Cleckheaton, however the land between the site and Whitechapel Grove prevents the physical merger of the two settlements. The land stretches between Whitechapel Road to the south, the M62 to the east and the A58 to the north and is not therefore seen as part of the wider countryside. A Noise Assessment would be required to be submitted as part of any planning application received on the site. Policy PLP52 of the Local Plan states that any planning application must be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the noise 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.

Paragraph/Site: **E1831**

Consultee: **1049393 Cllr Andrew Pinnock**

Agent:

Rep ID: **PDLP_AD582**

Soundness - Justified Impact on air quality. Increase in traffic congestion. It seems odd that the comments in relation to traffic which are to be found under Housing site H69 have not been applied here. The proximity of the site to houses on Whitechapel Road would make it desirable to restrict or remove access via Whitechapel Road, OR put a large buffer zone at this end of the allocation.

Council Response No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required.. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality. Pollutant levels in close proximity to this site have never been, nor currently exceed health related pollutant objectives.

Paragraph/Site: **E1831**

Consultee: **1057644 Mr Arthur Stead**

Agent:

Rep ID: **PDLP_AD955**

Soundness - Positively Prepared Concerned at the vital loss of Green Belt land and that it is not appropriate to have employment buildings on a residential road and next to the peace of a cemetery.

Soundness - Justified Whitechapel Road is already very busy and with the new vastly increased Whitcliffe Mount school set to be opened it will further increase the numbers of Road users & pedestrians on this already congested B road.

Council Response No change required - The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required.. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted.

Paragraph/Site: **E1831**

Consultee: **1058570 Cllr John Lawson**

Agent:

Rep ID: **PDLP_AD1997**

Soundness - Justified Impact on air quality. Increase in traffic congestion. It seems odd that the comments in relation to traffic which are to be found under Housing site H69 have not been applied here. The proximity of the site to houses on Whitechapel Road would make it desirable to restrict or remove access via Whitechapel Road, OR put a large buffer zone at this end of the allocation.

Council Response No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. Various access options exist to serve the development including from A58 Whitehall Road which is subject to a de-restricted speed limit (60mph). A stopping sight distance of 215m is required. A secondary access is possible from the B6120 Whitechapel Road. 2.4 x 43m (30mph speed limit) visibility splays required.. The connecting links assessment which considers the impact of the development on the local road network considers that the site is acceptable. Need for the development to potentially contribute towards schemes identified in the IDP has been noted. The area is not in or near an Air Quality management area or an area of concern in terms of Air Quality. Pollutant levels in close proximity to this site have never been, nor currently exceed health related pollutant objectives.

Paragraph/Site: **E1985a**

Consultee: **942293**

Agent: **941820 Mr John Brooks**

Rep ID: **PDLP_AD2292**

Soundness - Justified The site cannot provide the required employment provision due to remediation costs involved. Enabling development (residential) is required to bring the site forward. The site boundary should be altered to reflect site E1985 as per the Draft Local Plan, there are exceptional circumstances to retain this land within the site boundary.

Proposed Change Requested Amend site boundary as per draft plan and consider allocating the site for mixed use development or recognise the need for enabling development on this site.

Council Response No change required - This site is a new alternative to previously accepted employment site E1985. This represents a change from the draft Local Plan

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

(November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment option has been accepted for the following reasons. Site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. In view of this exceptional circumstances exist to release land from the green belt for B2 operations. This site is separated from any settlement in Kirklees by major roads, including the M62 and M606 motorways. One of the purposes of the green belt is to prevent neighbouring towns from merging into one another and although it is acknowledged that there is development on the west of Bradford Road, undeveloped frontages help to maintain the appearance of separation. The extent of this site could reinforce merger between Oakenshaw and Cleckheaton, however the open fields between the site and Cliff Hollins Lane would retain separation.

Paragraph/Site: **E1985a**

Consultee: **1045848 Mrs Toni Rios**

Agent: **1045846 Mr Christopher Yapp**

Rep ID: **PDLP_AD375**

Council Response

No change required - support for allocation noted.

Paragraph/Site: **E1832c**

Consultee: **942293**

Agent: **941820 Mr John Brooks**

Rep ID: **PDLP_AD2304**

Council Response

SUPPORT - No change required, support for employment site E1832c noted.

Paragraph/Site: **E1832c**

Consultee: **942768 Mr Andrew Wood**

Agent:

Rep ID: **PDLP_AD1771**

Soundness - Consistent with National Policy

Development on the waterworks site south of the road would be acceptable but the greenfield site north of the road is a major intrusion into countryside and reduces openness in the local landscape.

Proposed Change Requested

Northern segment of proposed allocation should be deleted.

Council Response

No change required - This site is a new alternative to previously accepted employment site E1832. This represents a change from the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment option has been accepted for the following reasons. Site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. Given the importance of such a site in meeting the objectives of the city region and councils own economic strategies exceptional circumstances to release the land from the green belt can be demonstrated. The presence of green belt in Calderdale prevents physical merger with adjoining settlements and the restriction of the extent of the site northwards limits the impact on the gap. This is an area of countryside but the option follows defensible boundaries, particularly to the north, so there is no risk of sprawl, although there would be risk of development pressure on the remaining green belt land sandwiched between the site and Leeds Road which is already an area of urban fringe. There are areas of priority habitat within the site and historic assets in close proximity.

Paragraph/Site: **E1832c**

Consultee: **943814 Cllr Robert Finnigan**

Agent:

Rep ID: **PDLP_AD3606**

Duty to Co-operate

Kirklees Council has had minimum contact with both Leeds City Council and Highways England on the impact E1832c will have on this neighbouring local authority. Little if any evidence exists that the impact on Junction 25 of the M62 has been fully considered. In these circumstances it is clear that the duty to cooperate has not been fully satisfied as a realistic and achievable plan to cope with the impact of such developments has not been produced or agreed.

Soundness - Effective

Little evidence exists that a clear infrastructure plan exists to consider the impact of the proposal on Junction 25 of the M62.

Soundness - Consistent with National Policy

Removing the site from Green Belt breaches obligations in NPPF to retain the Green Belt except in exceptional circumstances.

Council Response

No change required - This site is a new alternative to previously accepted employment site E1832. This represents a change from the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. Given the importance of such a site in meeting the objectives of the city region and councils own economic strategies exceptional circumstances to release the land from the green belt can be demonstrated. The fragmented land use presents some opportunity for limited settlement expansion without significantly impacting on the openness or strategic role of the green belt. This area includes part

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

of Kirklees Park which also contains significant historic assets, which are within Calderdale. Refer to modification AD-MM7 in the Local Plan Proposed Modifications document (SD4 page 13) for the modification proposed to the site allocation text box relating to transport issues. Duty to Cooperate Response: The Duty to Cooperate statement (SD14) demonstrates how the Council has complied with its duty to cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. These issues have been addressed within Highways England's letter to Kirklees Council dated 12th April 2017 (see BP28 Appendix C). Highways England's recommendations within BP28 were informed by LE141 and their latest Network Analysis Tool modelling.

Paragraph/Site: **E1832c**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3697**

Soundness - Justified

The development of this area has the potential to affect several elements which contribute to the significance of the Grade II Registered Historic Park and Garden at Kirklees Park and the numerous designated heritage assets within it. These include three Grade I and four Grade II* Listed Buildings. No evaluation of what contribution this site makes to the significance of the numerous heritage assets in this area or what harm might result to those elements which contribute to the significance of these assets by its eventual development. There is a need for a robust assessment of the impact which this allocation might have upon those elements which contribute to the significance of these assets. The original allocation was supported by a very comprehensive evaluation of the potential impact which the development of this area might have upon the numerous heritage assets in its vicinity. This revised layout proposes a very different development area to that originally evaluated in the 2013 Heritage Impact Assessment. Need to update the 2013 assessment. The Interim Summary – Heritage Assessment does not do this.

Soundness - Consistent with National Policy

The NPPF makes it clear that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. The NPPF makes it clear that Scheduled Monuments and Grade I and II* Listed Buildings are considered to be heritage assets of the highest significance where substantial harm or loss should be wholly exceptional. The need to conserve those elements which contribute to the significance of the many designated heritage assets in this area (in line with the advice in Paragraph 132 of the NPPF) may significantly constrain the quantum of developable land or the uses that might be appropriate upon it. The evidence available does not support this.

Council Response

No change. Correspondence within BP28 (dated 24 th February 2017) clarifies Historic England's current position with respect to these earlier comments, specifically that Historic England no longer consider that there has been no evaluation of the impact of any of the sites upon the historic environment. Historic England now fully acknowledge that the selection of sites which have been put forward as allocations in the Plan have been arrived at following a series of evaluations by the Council of the potential impacts that of all the sites might have upon the historic environment. Historic England endorse the process undertaken to arrive at the selection of sites included in the Plan and this has involved full consultation with, and considerable input from, Historic England throughout. Historic England have also confirmed that the Plan does not include any sites whose development will result in substantial harm to a designated heritage asset (and whose allocation, therefore, would be likely to conflict with national policy guidance). Following the Regulation 19 Publication Draft Local Plan Consultation which closed on 19th December 2016, the council has received an updated Heritage Appraisal (SS4) relating to this site.

Paragraph/Site: **E1832c**

Consultee: **944901 Mr David Craggs**

Agent:

Rep ID: **PDLP_AD1742**

Soundness - Positively Prepared

- Ignores the objective assessment of its own evidence base

Soundness - Justified

- Manipulation or mistreatment of evidence regarding likely growth or otherwise of employment in the manufacturing sector, which it is using to justify unwarranted greenbelt land forward for industrial development. - Concern in the way in which the evidence base around the Economic Needs Assessment has been adjusted. Based on the Council's preferred growth scenario, projected full-time equivalent employment in the manufacturing sector has shifted very substantially from a loss of 2,380 jobs between 2013 and 2031 in the 2015 figures, to a gain of 2,869 jobs over the same period in the 2016 figures. Not at all clear how and why such a major revision has been made. In the 2015 figures overall FTE job growth across all occupational sectors between 2013 and 2031 was projected at 32,200 (based on the Council's preferred growth scenario). Manufacturing, a decline of 2,380 jobs – a very significant fall in the context of the overall projection. In the 2016 figures overall job growth across all sectors is revised down to 23,197 but the contribution from manufacturing employment somehow switched from a net negative position of -2,380 jobs to a net positive position of 2,869 – a quantitative adjustment of some 5,249 jobs (an about turn of 221%) and now suddenly accounting for 12.4% of all projected job growth through to 2031. Projections for all other economic sectors bar

one have been revised down. Treatment of manufacturing sector employment in the 2016 figures is simply not credible. Council is attempting to reverse engineer its own employment forecasts in order to justify proposed industrial development on the local greenbelt. -No sound justification for the quantum of additional land the Council claims is needed for future manufacturing employment, no justification for reallocating greenbelt land on the same basis. - Does not use available evidence appropriately

Soundness - Consistent with National Policy

- Not consistent with national planning policy regarding the treatment of greenbelt land.

Council Response

This site is a new alternative to previously accepted employment site E1832. This represents a change from the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment option has been accepted for the following reasons. Site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. Given the importance of such a site in meeting the objectives of the city region and council's own economic strategies exceptional circumstances to release the land from the green belt can be demonstrated. Technical appraisal responses to issues raised during consultation: Biodiversity - The area of common spotted orchids suggest a lack of agricultural improvements to a grassland and should be retained if it can be mapped. The nearest great crested newt record we hold is 1.5km to the east and this record is questionable. We would not expect this to be an issue. We should have included a 10m buffer from all water courses in our response for otter, bats and general protection of the river corridor (WYE). Historic Environment - FAS heritage assessment recommends the preservation of the park boundary and the retention of the park wall, cottage and deer house. No construction should take place within the park boundary but if it was to then mitigation by sensitive design and screening will be required. Site promoter will be taking account of such recommendations - which have been broadly agreed with HE - and will put in place appropriate levels of mitigation. Part of the site falls within flood zone 2 and 3. Sequential test will be required.

Paragraph/Site: **E1832c**

Consultee: **946946**

Robert A Craggs

Agent:

Rep ID: **PDLP_AD1752**

Soundness - Positively Prepared

- Ignores the objective assessment of its own evidence base

Soundness - Justified

- Manipulation or mistreatment of evidence regarding likely growth or otherwise of employment in the manufacturing sector, which it is using to justify unwarranted greenbelt land forward for industrial development. - Concern in the way in which the evidence base around the Economic Needs Assessment has been adjusted. Based on the Council's preferred growth scenario, projected full-time equivalent employment in the manufacturing sector has shifted very substantially from a loss of 2,380 jobs between 2013 and 2031 in the 2015 figures, to a gain of 2,869 jobs over the same period in the 2016 figures. Not at all clear how and why such a major revision has been made. In the 2015 figures overall FTE job growth across all occupational sectors between 2013 and 2031 was projected at 32,200 (based on the Council's preferred growth scenario). Manufacturing, a decline of 2,380 jobs – a very significant fall in the context of the overall projection. In the 2016 figures overall job growth across all sectors is revised down to 23,197 but the contribution from manufacturing employment somehow switched from a net negative position of -2,380 jobs to a net positive position of 2,869 – a quantitative adjustment of some 5,249 jobs (an about turn of 221%) and now suddenly accounting for 12.4% of all projected job growth through to 2031. Projections for all other economic sectors bar one have been revised down. Treatment of manufacturing sector employment in the 2016 figures is simply not credible. Council is attempting to reverse engineer its own employment forecasts in order to in order to justify proposed industrial development on the local greenbelt. -No sound justification for the quantum of additional land the Council claims is needed for future manufacturing employment, no justification for reallocating greenbelt land on the same basis. - Does not use available evidence appropriately

Soundness - Consistent with National Policy

- Not consistent with national planning policy regarding the treatment of greenbelt land.

Council Response

No change Submission document 22 (SD22) 'Employment Technical Paper' sets out the evidence used to justify the Council's approach in addressing the employment needs of the district. Chapter 4 of submission document SD22 summarises the approach taken when calculating the OAN for jobs, and justifies the scenario used to calculate the jobs need for Kirklees. Paragraph 8.1-8.7 provides a summary of the key findings from the evidence used and justifies the approach taken for jobs and land. Paragraphs 2.21-2.23 of submission document 22 (SD22) 'Employment Technical Paper' sets out the Council's objectives for manufacturing as established in the Kirklees Economic Strategy (KES). These objectives have been modelled through the Regional Econometric Model (REM) to establish the objectively assessed need for jobs. The evidence established from baseline performance, the modelling of scenarios and justification for the

chosen approach has been set out in Chapter 4 of submission document SD22. The need for large strategic sites of this nature has also been justified in SD22 paragraphs 8.1-8.7 which has drawn upon a range of local evidence which as summarised within this paper. The reason for the overall reduction in the rate of the employment growth, when compared to the Draft Local Plan, is set out in paragraphs 4.19-4.20 of SD22. Paragraphs 4.15-4.18 justifies the need to re-run the economic forecasting to reflect updated evidence, used in the REM, and changes made to objective outcomes. Appendix 3, Scenario 1: Baseline projections, and Graph 1: Baseline projection on page 19, help to demonstrate that even without council intervention manufacturing jobs are forecast to be far more resilient than had originally been forecast in the Draft Local Plan. The quantum of land required for manufacturing is set out in Table 2, page 27 of submission document 22 (SD22) 'Employment Technical paper'. The jobs density assumptions applied to achieve the land requirement has been set out in paragraphs 5.1-5.3 on page 26 of SD22. The Green Belt Review Supporting Document (BP25 section 6) states that the need to meet the objectively assessed need for housing and employment establishes the exceptional circumstances required to amend the green belt boundary. The site has been assessed taking account of social, economic and environmental considerations. The methodology applied has been set out in background paper 23 (BP23) 'Local Plan Methodology Statement Part 2' paragraphs 4.15-4.63. The assessment scores have been summarised and set out in background paper 29 (BP29) 'Accepted Site Options – Technical Appraisals'. The need for large strategic sites of this nature has also been justified in SD22 paragraphs 8.1-8.7 which has drawn upon a range of local evidence which has been summarised in this paper. The approach taken by the Council is consistent with NPPF paragraph 83 which states that green belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Green Belt Review Supporting Document (BP25 section 6) states that the need to meet the objectively assessed need for housing and employment establishes the exceptional circumstances required to amend the green belt boundary, subject to an individual site assessment that establishes that the benefits of meeting objectively assessed need outweighs the harm to the green belt caused by the removal of land from it. The method of assessing each individual development option, including the green belt assessment is set out in the 'Local Plan Methodology Statement Part 2' (BP23 paragraphs 4.51-4.56). The exceptional circumstances that apply to site E1832c have been set out in background paper 29 (BP29) 'Accepted Site Options – Technical Appraisals' on page 2.

Paragraph/Site: **E1832c**

Consultee: **961855**

Colin Berry

Agent:

Rep ID: **PDLP_AD641**

Soundness - Positively Prepared

- Insufficient consideration has been given to brownfield sites - Need for this large industrial site is not proven - MX129 and MX1911 should be returned to employment allocations and would provide sufficient provision and remove the need for E1832c - Community objections to this proposal - at all consultation stages - have continually been ignored - The allocation conflicts with the Council's own local plan policy in relation to protection and enhancing existing green infrastructure assets, and minimising fragmentation of green infrastructure networks - Site E1832c conflicts with the Kirklees Trees and Woodland Strategy and the Kirklees Environment Unit report.

Soundness - Justified

- Allocation fails to fully recognise the significance of the Kirklees Priory site - Inconsistent approach applied to the implications of development on scheduled ancient monuments - Significant impact upon the landscape - Significant impact upon the historical setting of a nationally significant site - Impact upon good quality agricultural land - Impact upon woodland - some of which is ancient - hedgerows and streams - No mention of the Landscape Character Assessment undertaken by the Council which assessed this site as moderate to high condition, and overall described as 'a tranquil farmed landscape with extensive, far reaching views'. Allocation is contrary to the studies recommendations - Impact upon PROWS which are of historical significance - 4 different boundaries have been considered for this site. - Different green belt assessment outcome for the alternative rejected options which relate to this development to accepted option E1832c. Assessment has clearly been adapted to suit outcome. - The Council concluded that no exceptional circumstances exist to release land from the green belt for the rejected options for this development. This conflicts with the outcome for the accepted site option E1832c where the conclusion claims exceptional circumstances do exist - Impact upon the green corridor down the Calder Valley affecting woodland and priority wildlife habitats - Impact of E1832c is greater than previous accepted option E1832 which was included in the draft local plan - E1832c is not the most appropriate as no consideration has been given to reasonable alternatives - Highways England has stated the cumulative impact of all the housing, employment and mixed use allocations will have a significant adverse traffic impact on the Strategic Road Network in West Yorkshire and its junction with the local primary road network. One employment site with major individual adverse impact is Cooper Bridge. - Impact of air, noise and light pollution - Site impacts upon priority wildlife habitats but there is no plan to preserve these habitats - There is no plan in place to resolve Historic England's concerns in relation to heritage impacts

Soundness - Effective

- Part of the site option extends into Calderdale - The cost of infrastructure requirements would make this site undeliverable - Site is undeliverable due to constraints in relation to planning, funding, highways and topography - The number of mitigation measures required to offset the heritage impact makes the site undeliverable - Site E1832c would conflict with and not enable the delivery of key strategic objectives within the local plan - At the draft local plan stage

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

	<p>Historic England concluded there had been insufficient evaluation of what impact the loss of currently open areas and their subsequent development might have upon heritage assets. Required mitigation may result in reduced development capacity or make a site largely undevelopable.</p>
Soundness - Consistent with National Policy	<p>- Proposed development fails to demonstrate the exceptional circumstances required to release land from the green belt. Three options for this site were rejected on these grounds, therefore the accepted option should also have been rejected. - Site plays a vital role in maintaining a green corridor along the Calder valley and is categorised as "strategic green infrastructure" by Natural England. This kind of area as identified by Natural England is supported by NPPF guidance. Kirklees Council fails to take this into account. - Site conflicts with NPPF 7. No evidence has been provided to demonstrate that sustainable development in terms of the historic environment can be delivered.</p>
Proposed Change Requested	<p>Retain brownfield element of the site but remove that part of the proposed allocation which is currently in the green belt. The strategy should focus on the re-use of brownfield sites and revert proposed mixed use sites back to employment allocations. Employment should be focussed towards bases in and adjacent to town centres, and the development of small scale manufacturing bases on brownfield sites close to centres of population.</p>
Council Response	<p>No Change This site is a new alternative to previously accepted employment site E1832. This represents a change from the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The DtC statement demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. Site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. Given the importance of such a site in meeting the objectives of the city region and councils own economic strategies exceptional circumstances to release the land from the green belt can be demonstrated. The presence of green belt in Calderdale prevents physical merger with adjoining settlements and the restriction of the extent of the site northwards limits the impact on the gap. This is an area of countryside but the option follows defensible boundaries, particularly to the north, so there is no risk of sprawl, although there would be risk of development pressure on the remaining green belt land sandwiched between the site and Leeds Road which is already an area of urban fringe. There are areas of priority habitat within the site and historic assets in close proximity. The plan has identified a range of sites to ensure employment opportunities exist for the local workforce. Employment allocations have taken into account the proximity of the site to the workforce and the sites accessibility to public transport. Priority Employment Areas have also been designated to ensure existing employment stock - which is serving the local and wider economy - is protected to enable business growth and support the needs of local people. Technical appraisal responses to issues raised during consultation: Biodiversity - The area of common spotted orchids suggest a lack of agricultural improvements to a grassland and should be retained if it can be mapped. The nearest great crested newt record we hold is 1.5km to the east and this record is questionable. We would not expect this to be an issue. We should have included a 10m buffer from all water courses in our response for otter, bats and general protection of the river corridor (WYE). Impact upon Grade II registered Historic Park and Garden and Kirklees Hall - including other designated heritage assets. FAS recommendation is for the development to preserve the boundary of the park, retain the park wall, cottage and deer house. Beyond the park boundary, potential impact on designated heritage assets decreases. Impact on the setting of the Listed Buildings of the surrounding area would potentially be moderate, and would require mitigation through sensitive design and screening. Site falls within an AQMA therefore impact assessment will be required. Noise assessment and phase 1 and 2 contaminated land study also required. No absolute constraints identified but the findings of the aforementioned studies will need to be factored in, and appropriately mitigated, when planning permission is sought. Highways - local links has not identified any significant issues. Safety issues identified within the vicinity of the site. Access is achievable. Issues can be mitigated via the proposed highways improvements planned for Cooper Bridge through the West Yorkshire Transport Fund. The Council has strategically modelled the transport network (local highway, public transport and</p>

strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper.

Paragraph/Site: **E1832c**

Consultee: **968497**

Erica Amende

Agent:

Rep ID: **PDLP_AD532**

Soundness - Positively Prepared Loss of green belt

Soundness - Justified

Spenn Valley Civic Society respectfully invites the Inspector to consider the following matters: 1. the site location is in open countryside 2. the site is nowhere near an existing or proposed rail station 3. the site has poor public transport links 4. the location is heavily congested in all directions 5. development of the site would generate significant car journeys. 6. the site is not close to a pool of labour 7. it is far too dangerous to cycle to this location 1. The site is not an extension to an existing built up area. It is an island site within the green belt. 2. Railways are irrelevant to this site. 3. Lack of public transport and poor frequency of service. 4. Traffic congestion - heavy and lengthy congestion at all three junctions around and at Cooper Bridge. Additionally, congestion from Cooper Bridge along the A62 at peak times 5. If the Three Nuns site were to be developed and if it were to generate significant employment (itself a point of debate) then inevitably it would attract very many more car and HGV journeys. Not only from the north and the south but via the M62 and Jn 25 to the west. 6. The generated car journeys would be quite lengthy because the Three Nuns site is not close to major residential areas. 7. The main arterial roads are far too busy for cycling to be seriously entertained. The cycle lane on the A62 is painted on the footway. Paras 10.62-10.66 (Transport – Sustainable Travel – Strategies and Policies) can't be taken seriously re: cycling and walking.

Soundness - Effective

Concern that the identified transport schemes will be achieved given other strategic highway projects in West Yorkshire and funds required from site developer. Question the impact on CIL if a contribution is made to this site. Consider that the highway implications for traffic in the Cooper Bridge and the wider area should be re-examined and examine how these issues are addressed and judge whether they are adequate, realistic and affordable in all respects:.

- In view of existing congestion between Cooper Bridge, the M62 and Brighouse how is this to be dealt with?
- What works are planned at M62 Jn 25 to enable traffic to enter and exit?
- What are the traffic implications of the major (but smaller) urban extension planned by Calderdale at Brighouse (Thornhill) and the one by KMC at Bradley?
- What is the role and purpose of the planned new M62 24A junction?
- What are the highway works planned for the A62 to address existing congestion north and south of Cooper Bridge?
- What is the design for the junction and access road for the development site? NOTE there are drawings in the Supporting Evidence and Background Information section which show an access outside of Kirklees in Calderdale.
- How much is all this going to cost?
- Where is the money coming from?

Soundness - Consistent with National Policy

The Local Plan is unsound because the site location is not a sustainable location for development, contrary to national policy.

Proposed Change Requested

Delete allocation E1832c from the Plan. Review the amount of new employment land required in Kirklees Review alternatives for employment provision including fresh impetus on urban renewal and seeking a range and distribution of smaller sites which can be delivered at lower cost and with much better sustainability credentials and reduced environmental harm.

Council Response

No change The Green Belt Review Supporting Document (BP25 section 6) states that the need to meet the objectively assessed need for housing and employment establishes the exceptional circumstances required to amend the green belt boundary (which will include land in the countryside). Site specific evidence document SS4, provides information in relation to proposed highways improvements that would help to relieve current congestion issues, how traffic generated from this site can be supported and how it would be funded. These proposals are set out on pages 9-18. The site is located along the Leeds Road Corridor and is in close proximity to an established chain of businesses and industrial uses. Given the proposed allocations proximity to the motorway network (Jct. 25 of the M62), nearby settlements and on a public transport route, it is considered that the site is accessible to the labour force. Local Plan policies PLP19, 'Strategic transport infrastructure' and PLP20, 'Sustainable travel', will seek to secure the development has safe and convenient access to the West Yorkshire Key Route Network where possible, the main arterial routes and the West Yorkshire Core Bus Network that connect the region. Policy PLP20 will help to ensure the development is designed to encourage sustainable travel - including the cycle network. Site E1832c has scored a double positive on sustainable transport in Table 5 of the Sustainability Appraisal report none technical summary (submission document SD9). Refer to modification AD-MM7 in the Local Plan Proposed Modifications document (SD4 page 13) for the modification proposed to the site allocation text box relating to transport issues.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Paragraph/Site: **E1832c**

Consultee: **968497**

Erica Amende

Agent:

Rep ID: **PDLP_AD531**

Soundness - Justified

The site is not justified due to impact of prospective site engineering works: - several hectares of the site would be lost to development due to roads, reconfigure and sustainable drainage - a phased development is unlikely due to the levels of the site. Provision of bridges, flood balancing structures along Nun Brook would mean the site has to be constructed all at once. - the Kilmartin illustration of the plateaux shows that the site is arguably four sites in close proximity served off a single access - unclear whether very large buildings could be constructed partially on made (raised) ground and partially on solid cut leading to additional construction costs. - two large gas mains cross the site - not clear whether there are mining issues associated with the site - the implementation of sustainable drainage would impact on the landscape and effectively destroy Nun Brook - mitigation to address visual impact of the buildings harmful - the site includes land and access in Calderdale - the illustrative layout assumes the site is one level plateau - unclear whether a secondary access is required In conclusion it would appear that to develop the site (not including highway connection and traffic costs) would be very costly on the public and private purse; so much so that if development was more expensive than sites elsewhere then the land will not be brought forward. If the profitability of the site is shown to be marginal, the owner may not even be willing to sell the land after all.

Soundness - Effective

The site is not viable as the buyer must reimburse the vendor 40% of any uplift in land values attributable to the development of the land. A GVA commissioned report on CIL supports this. The reports by Jones Lang LaSalle and Dove Haigh Phillips (available with the core strategy) observed that the land will not be developed if it cannot be done so profitably. And both are unequivocal; the site cannot be developed without public sector assistance including very large scale funding.

Proposed Change Requested

Modify the plan by deleting that part of this site north of the Leeds/Huddersfield Road. Review the amount of new employment land required in Kirklees Review alternatives for employment provision including fresh impetus on urban renewal and seeking a range and distribution of smaller sites which can be delivered at lower cost and with much better sustainability credentials and reduced environmental harm.

Council Response

No change. The Cooper Bridge Delivery Statement, site specific information document 4 (SS4), outlines the constraints associated with the site and details how development will take account of these constraints. Information on how the site can be developed is set out under sub-heading 'Masterplan' on pages 3-9. Kirklees Council does not propose to allocate land in neighbouring Calderdale. The boundaries of E1832c are shown on submission document 3 (SD3). In terms of access and regress, it is acknowledge that this is likely to be delivered on land in Calderdale; however, the evidence indicates that this location is achievable and capable of meeting highway design parameters. This evidence has been, and continues to be, shared through the 'Duty to Cooperate' process with Calderdale Council – see submission document 14 (SD14), pages 105-106, reference 17. The site promoter has provided evidence, as set out in the 'Cooper Bridge Delivery Statement', site specific information document 4 (SS4), that the site is considered to be deliverable (refer to sub-heading 'Masterplan' on pages 3-9). With regards to viability, the Council has demonstrated the general viability of the Local Plan, this information is set out in Kirklees Local Plan and Community Infrastructure Levy Viability Study (Oct 2015); Kirklees Local Plan and CIL Viability Addendum (Sep 2016). These can be accessed under section 8 of the Local Plan library - CIL1 and CIL2 respectively.

Paragraph/Site: **E1832c**

Consultee: **968511**

Mr Michael Hall

Agent:

Rep ID: **PDLP_AD925**

Legally Compliant

Consultation with local people has not been effective as the Council did not arrange local community consultation meetings to raise awareness of the Plan and explain how the draft Local Plan would impact on particular towns and villages. The Council appears to be promoting (via the West Yorkshire Authority) a major new transport development (North Kirklees Orbital) which does not appear to feature in the draft Local Plan, this again calls into question the legal compliance of the process.

Soundness - Justified

Whilst the development of the former waste water treatment works is sound and consistent with national policy, the land behind the Three Nuns is not considered sound. Mirfield Moor has outline permission for industrial development and is for sale years after first marketed, the land has important historical links, will impact on the historic park and gardens and Kirklees Hall, is an important piece of open space for recreation and habitats and is likely to increase flooding and impact residential amenity.

Proposed Change Requested

Restrict development to the waste water treatment works site.

Council Response

No change required - The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of

the pre-submission process and published on the council's website. Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. Site has been accepted to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering. It has been demonstrated there are no site opportunities of the size and location required by manufacturing within the localities of Kirklees. Given the importance of such a site in meeting the objectives of the city region and councils own economic strategies exceptional circumstances to release the land from the green belt can be demonstrated. Technical appraisal responses to issues raised during consultation: Biodiversity - The area of common spotted orchids suggest a lack of agricultural improvements to a grassland and should be retained if it can be mapped. The nearest great crested newt record we hold is 1.5km to the east and this record is questionable. We would not expect this to be an issue. We should have included a 10m buffer from all water courses in our response for otter, bats and general protection of the river corridor (WYE). Historic Environment - FAS heritage assessment recommends the preservation of the park boundary and the retention of the park wall, cottage and deer house. No construction should take place within the park boundary but if it was to then mitigation by sensitive design and screening will be required. Site promoter will be taking account of such recommendations - which have been broadly agreed with HE - and will put in place appropriate levels of mitigation.

Paragraph/Site: **E1832c**

Consultee: **974725**

Andrea Jenkyns

Agent:

Rep ID: **PDLP_AD2364**

Soundness - Justified

This proposal is going to have a dramatic negative impact on the people in and round the sites but also those in Morley and Outwood. The Greenbelt in this part of the country has been under continuous attack from development proposals and this is yet another proposed reduction in our already limited and precious green space. The proposals fail to detail where the exceptional circumstances occur that justify building on Greenbelt. As such, the proposal to include both sites as Significant Development Sites is in breach of the National Planning Policy Framework requirement to retain Greenbelt and release it on only exceptional circumstances.

Soundness - Consistent with National Policy

In breach of the National Planning Policy Framework requirement to retain Greenbelt and release it on only exceptional circumstances.

Proposed Change Requested

The removal of the site from the local plan with their replacement on previously developed brownfield sites.

Council Response

No change. The technical appraisal of the site has identified no absolute constraints in relation impacts upon human health – see background document 29 (BP29) 'Accepted Site Options – Technical Appraisals' report. Appropriate levels of mitigation will be required and can be secured through the planning application process. The quantum of land required for manufacturing is set out in Table 2, page 27 of submission document 22 (SD22) 'Employment Technical paper'. The jobs density assumptions applied to achieve the land requirement has been set out in paragraphs 5.1-5.3 on page 26 of SD22. The Green Belt Review Supporting Document (BP25 section 6) states that the need to meet the objectively assessed need for housing and employment establishes the exceptional circumstances required to amend the green belt boundary. The approach taken by the Council is consistent with NPPF paragraph 83 which states that green belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan. The Green Belt Review Supporting Document (BP25 section 6) states that the need to meet the objectively assessed need for housing and employment establishes the exceptional circumstances required to amend the green belt boundary, subject to an individual site assessment that establishes that the benefits of meeting objectively assessed need outweighs the harm to the green belt caused by the removal of land from it. The method of assessing each individual development option, including the green belt assessment is set out in the 'Local Plan Methodology Statement Part 2' (BP23 paragraphs 4.51-4.56). The exceptional circumstances that apply to site E1832c have been set out in background paper 29 (BP29) 'Accepted Site Options – Technical Appraisals' on page 2. Evidence in relation to cooperation with Highways England regarding the strategic road network is set out in the Duty to Cooperate Statement (SD14) and within Highways England letter to Kirklees Council dated 12th April 2017 (see BP28 appendix C). Refer to modification AD-MM7 in the Local Plan Proposed Modifications document (SD4 page 13) for the modification proposed to the site allocation text box relating to transport issues.

Paragraph/Site: **E1832c**

Consultee: **1049121**

Mr Anthony Rae

Agent:

Rep ID: **PDLP_AD798**

Duty to Co-operate

In terms of overall sustainability the combined Kirklees and Calderdale proposed allocations are not sustainable in view of the transport impacts (and in addition to the local environmental impact on existing greenfield sites). Both authorities should be required to produce a combined sustainability assessment to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

to-work carbon emissions, and loss of Greenbelt functionality.

Soundness - Positively Prepared

Loss of green belt.

Soundness - Justified

Object - on cumulative traffic impact grounds, in both Kirklees and Calderdale, and on the M62: The Bradley Park Masterplan Delivery Statement Part 1 identifies the traffic impact for the site on its own, current capacity constraints at junctions, queuing and congestion at the signalised junction where Bradley Road intersects with the A62. Support allocation text that there is the potential for a severe impact on the operation of the Strategic Road Network. However, this does not take into account cumulative impact of development including the impact of H351 and E1832c and high level of development in Calderdale. Adjacent site H351 which is part of the Bradley Park Masterplan: the combined number of new housing units at both H1747 and H351 would be 1,938. As at December 2016 the number of new units proposed across the district boundary on the two adjacent possible Calderdale urban extension sites – Woodhouse: 1,223 units, and Thornhill Lane: 1,926 units see Strategic Vision for South East Calderdale, WSP Nov 2016 - total 3,149 in Calderdale, which when set alongside the Kirklees housing proposals would bring the number of proposed new units to 5,087 in both districts. This very high weight of new housing should have been explicitly referred to, but is not. Additionally the adjacent and allocated employment site at Cooper Bridge E1832c, identified at 33-35 ha and 161,000 square metres capacity, should also have been explicitly referred to. It is this combined cumulative transport impact that should be assessed in relation to site H1747. But such proposals also operate in the opposite direction. By increasing road traffic demand to a very considerable extent at this location alongside the M62 they also apply pressure to authorities such as Highways England to increase capacity and accessibility on the strategic highway network (beyond that now been provided by the smart motorways programme) which will consequently undermine the sustainability of overall transport and climate change policies, both in this local plan and beyond (see: 'Development proposals will need to demonstrate that any committed RIS schemes are sufficient to deal with the additional demand generated by that site.')

Proposed Change Requested

A reassessment of the overall spatial direction and sustainability of the Plan, and then the selection of Spatial Priority Areas in the LCR Strategic Economic Plan. That both authorities should be required to produce a combined sustainability assessment to demonstrate how they believe the proposals can be delivered without adverse impacts on generated traffic, local and strategic highways congestion, travel-to-work carbon emissions, and loss of Greenbelt functionality.

Council Response

No Change This site is a new alternative to previously accepted employment site E1832. This represents a change from the draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Highways - local links has not identified any significant issues. Safety issues identified within the vicinity of the site. Access is achievable. Issues can be mitigated via the proposed highways improvements planned for Cooper Bridge through the West Yorkshire Transport Fund. The Council has strategically modelled the transport network (local highway, public transport and strategic road network) in order to assess the cumulative transport impact of the land use allocations in the Publication Draft Local Plan. The work identified locations on the highway network which are forecast to suffer increased delays as a result of the proposals and the Council has devised an appropriate transport mitigation strategy. It is not considered therefore that the level of growth proposed would have a severe impact on Kirklees highway network that otherwise cannot be adequately mitigated against. See Transport Model Technical Paper (BP12). Refer to modification AD-MM7 in the Local Plan Proposed Modifications document (SD4 page 13) for the modification proposed to the site allocation text box relating to transport issues. DTC Response: The DTC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Calderdale Council and Kirklees Council are co-signatories to a draft statement of common ground that will be finalised in advance of the Local Plan hearing sessions. Paragraphs 4.21, 4.22, 4.23 and 5.15 in SD14 identify the joined up planning that Kirklees and Calderdale have undertaken to date.

Paragraph/Site: **E1832c**

Consultee: **1061679**

Calderdale Council

Agent: **1048879**

MR Philip Ratcliffe

Rep ID: **PDLP_AD2367**

Council Response

SUPPORT - No change required, comments noted.

Paragraph/Site: **E2333a**

Consultee: **942154**

unknown

Agent: **941891**

Paul Leeming

Rep ID: **PDLP_AD1986**

Council Response

SUPPORT - No change required, support for employment site E2333a noted.

Paragraph/Site: **E2333a**

Consultee: **942190**

Mr Andrew Brook

Agent:

Rep ID: **PDLP_AD1179**

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Justified	Land is very fertile and in full crop. Thriving wildlife on site, hares, skylark, rabbits, ground nesting birds, grey partridge, pheasants, barn and tawny owl, herons, ducks, newts, bats, badger set. Land floods on both sides of A636. River Dearne struggles with excess rains and bursts its banks onto the land, hard surfacing the area will compound the problem. Sewers run across the land and flood in heavy rain fall. Traffic congestion will increase (A636) and traffic through Bretton as cars travel to the M1. Access not suitable for development of this size. Adjacent site was rejected for development due to close proximity to sculpture park. H2333a is closer. Tourism will decrease. Plenty of empty factories in the Barnsley area.
Proposed Change Requested	Site to remain in the green belt
Council Response	No change. This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. River Dearne flows along the southern boundary which is a UK BAP priority habitat. Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation - including stand-off - is required. As such 1.9ha stand off around the River Dearne has been removed from the developable area, this includes 0.08 ha within flood zone 3b and 0.43 ha that fall within a UK BAP Priority Habitat. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b, this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable.

Paragraph/Site: **E2333a** Consultee: **942768** **Mr Andrew Wood** Agent: Rep ID: **PDLP_AD1772**

Soundness - Justified	This would represent a substantial extension of employment zone into open country. The northern half of the site is on higher ground so potentially is much more prominent.
Council Response	No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development.

Paragraph/Site: **E2333a** Consultee: **942963** **Mr Richard Brook** Agent: Rep ID: **PDLP_AD1429**

Soundness - Positively Prepared	Site E2333A is unreasonable use of the green belt.
Soundness - Justified	It is too big and does not reflect the settlement's size & character. It would damage irretrievably an area increasingly known for outdoor recreation & leisure tourism and destroy valuable farmland. At least the area north of the A636 should be rejected.
Proposed Change Requested	The site should be rejected.
Council Response	No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. A landscape impact assessment has been undertaken by the site promoter and

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development.

Paragraph/Site: **E2333a**

Consultee: **943042 Phil Grosvenor**

Agent:

Rep ID: **PDLP_AD1369**

Duty to Co-operate

There seems to have been no consultation with Wakefield or Barnsley councils, which have much bigger, flatter sites, within a few miles, and much closer to the M1 motorway.

Soundness - Positively Prepared

E2333a is Green Belt land, which should only be used for development in exceptional circumstances. Replacing an adjacent employment site with one in the Green Belt can by no means be considered exceptional circumstances. There are other brownfield sites in the area, which could be used including H3325a.

Soundness - Justified

Part of the site floods even in the summer with run-off from the higher part, which often covers the main A636 road. The link to the M1 from Clayton West (A636) is a single carriage way which gets very busy at peak times and winds through the village of West Bretton, home to the Yorkshire Sculpture Park. The site is currently good agricultural land, with crops in rotation, and should be kept as such. Clayton West is a small village and adding a huge industrial complex to it would ruin the character of it.

Soundness - Consistent with National Policy

The inclusion of the site goes against many of the clauses of the NPPF, which is the government policy which is supposed to be the framework for local plan design. The plan is aspirational but not realistic as required by the NPPF.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Part of the site is affected by flood zone 3b; this has been removed from the developable area. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. The Calder Catchment Strategic Flood Risk Assessment (SFRA) (LE43) was undertaken by JBA Consulting. This work was jointly commissioned between Kirklees Council, Calderdale Council and Wakefield Council to ensure updated flood risk assessment for the Calder Catchment. The SFRA process included working with planning, flood management and drainage officers from Calderdale and Wakefield to agree the approach and ensure consistency, and also with the Environment Agency to utilise their expertise and ensure the approach taken in the document met their requirements. The Environment Agency confirmed in writing on 25th August 2016 that they found the Calder Catchment Level 1 SFRA to be acceptable. Subsequently on 19th December 2016, the Environment Agency confirmed in writing (with respect to the duty to cooperate) that they have been consulted at various stages of the production of the local Plan, worked with the council to reach satisfactory outcomes, and are satisfied that issues they raised have been given due consideration. This employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees.

Paragraph/Site: **E2333a**

Consultee: **943162 Mr Frank Dolan**

Agent:

Rep ID: **PDLP_AD1419**

Legally Compliant

It does not meet the criteria for legal compliance. It is not based on robust and credible evidence. It is not the most appropriate strategy when considered against alternatives. It has not considered cross boundary/inter authority issues. It has not consulted widely and community engagement has been limited.

Duty to Co-operate

Residents in the nearby villages of West Bretton and Calder Grove have not been made aware of the proposals. Both are within the Wakefield MC area and the former is also the home of the internationally recognised Yorkshire Sculpture Park. Traffic exiting the M1 at exits 38 and 39 already chokes these villages especially for 2 to 3 hours in both early morning and early evening.

Soundness - Positively Prepared

The site is Greenbelt land which forms a green buffer between adjacent local communities. Brownfield sites are available within the locality which could be

developed to provide the smaller start up units for which there is a demand. The Vision and Objectives Section of the KMC Strategies and Policies Document recognises the natural beauty and heritage of this area, yet these plans would ultimately lead to its destruction. There has been only minimal if any involvement of the local communities. Two information sessions, neither of which was widely publicised, were held in Huddersfield and Dewsbury, a tedious journey, especially for those using public transport. Access to the plans via the Internet is also bad practice being predicated on the flawed assumption that this is available to all and that they have the skills to access and negotiate an unusually difficult and unwelcoming site.

Soundness - Justified

The site will add to air and noise pollution. Large areas of the site are already subject to persistent and lengthy periods of flooding. The 3 Enterprise Zones already being developed in Kirklees would provide more suitable locations. There is limited demand for large industrial units in Kirklees. There are many more convenient and cost effective sites available along the M1 corridor. Steep hills and the narrow and the often congested A636 is unsuitable for even more HGV traffic. Loss of valuable agricultural land and associated flora and fauna. Further destruction of the visual amenity. The artificial terraces created to accommodate the huge sheds cannot be hidden and will be seen from the Yorkshire Sculpture Park and surrounding areas. The Dearne and Holme Valleys have great potential for more tourism and this development will spoil the gateway to these areas. Over 5,000 new houses are planned for Kirklees Rural adding to the many hundreds of houses recently built, or undergoing construction. Infrastructure and the facilities essential for public health are already compromised; the proposals are therefore unsustainable. Notably it does not; Improve the health of local people, Secure an effective transport network, Protect and enhance the character of the landscape. Protect and enhance recreation facilities and areas of open space Provide the housing that meets local demand. Provide start up opportunities for local entrepreneurs.

Soundness - Consistent with National Policy

E2333a at Clayton West is an unsound allocation which fails to meet many of the requirements within Para 182 of the NPPF. Furthermore it ignores Kirklees' own proposed Planning Policies and Local Plan guidelines. The Plans do not ensure sustainable development for either Kirklees or Kirklees Rural and are therefore unsound, particularly with regard to National Policy, (para 182, NPPF).

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. Please refer to the Duty to Cooperate Statement for cross boundary and inter-authority issues, this employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b; this has been removed from the developable area. An Air Quality Impact Assessment and Noise Impact Assessment would need to be submitted as part of any planning application. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to offset the impact of development. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited; the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this area. DTC Response: The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process.

from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see 4.21 to 4.23 in SD14). Barnsley Council did not comment on this site. In relation to Wakefield Council and the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues. Wakefield Council did not comment on this site.

Paragraph/Site: **E2333a**

Consultee: **943612 Helen France**

Agent:

Rep ID: **PDLP_AD2012**

Soundness - Positively Prepared

- Site assessment fails to address cross boundary and inter-authority issues - The inclusion of the site contravenes Kirklees Local Plan policies and guidance - Prioritise the use of brownfield land - Larger firms are more likely to be attracted to more cost effective locations along the M1, particularly junctions 37 and 39 - Kirklees needs to work more closely with neighbouring authorities when considering employment sites on the Dearne Valley side of Kirklees

Soundness - Justified

- Reasonable alternatives have not been properly considered - Negative impact on the green belt - Site allocation will increase noise and air pollution in Clayton West - Risk of flooding will increase affecting the River Dearne's flood plain - There is no power network to service this site - Development is completely counter to the green corridor designation - Significant impact upon the landscape affecting the green interconnectivity between Kirklees, Barnsley and Wakefield - Development would be highly visible from Bretton Country Park - Very special circumstances do not exist to release land from the green belt. Brownfield opportunities exist - Loss of commercial to residential is compounding the issue - Access is unsuitable for a site of this scale - A636 is a single carriageway and highly congested already - Surrounding road network and junction 39 of the M1 is already at capacity and cannot accommodate further commercial traffic

Soundness - Consistent with National Policy

- Site is not compliant with paragraph 7 as development location does not support economic growth, it provides no social benefit as it is not well serviced and does not support the health, social or cultural wellbeing of current or future occupiers. The development fails to protect or enhance the natural, built or historic environment - Site is not compliant with NPPF paragraph 14 as the impact of the site outweighs the benefit to the local community - Site is not compliant with NPPF paragraph 17 as the site allocation does not accord with the 12 principles - Site is not compliant with NPPF paragraphs 80, 82 and 84 because the allocation fails to comply with these requirements - Site is not compliant with NPPF paragraph 100 because part of the site serves as the flood plain to the River Dearne and the underlying strata is unsuitable for soakaway arrangements - Site is not compliant with NPPF paragraphs 109, 110, 114 and 119 because parts of the site are in a UK BAP priority habitat - Site is not compliant with NPPF paragraph 112 because the site results in the loss of valuable agricultural land - Site is not compliant with NPPF paragraphs 150, 151 and 152 because the allocation does not reflect the visions or aspirations of the local community in the Dearne Valley

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. Please refer to the Duty to Cooperate Statement for cross boundary and inter-authority issues, this employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. Part of the site is affected by flood zone 3b; this has been removed from the developable area. An Air Quality Impact Assessment and Noise Impact Assessment would need to be submitted as part of any planning application. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited; the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

area. Natural England has identified the River Dearne Corridor as strategic green infrastructure. Development proposals within this area will not necessarily be prevented – the council will seek to ensure that development proposals protect and enhance existing green infrastructure assets. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs.

Paragraph/Site: **E2333a**

Consultee: **943957 Mr Ian Smith**

Agent:

Rep ID: **PDLP_AD3698**

Soundness - Justified

By allocating this site for development, the Council is accepting that the principle of the loss of this currently-open area and its subsequent development is acceptable. However, there has been no evaluation of what contribution this site makes to the significance of this Registered Historic Park and Garden or what harm might result to those elements which contribute to its significance by its eventual development.

Soundness - Consistent with National Policy

Paragraph 126 of the NPPF requires Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. The allocation of this site could, potentially, harm elements which contribute towards the significance of this Registered Historic Park and Garden.

Council Response

No change. Following the Regulation 19 Publication Draft Local Plan Consultation which closed on 19th December 2016, further engagement has taken place between the council, Historic England and the site promoter and these issues have now been resolved. A Historic Impact Assessment has been carried out and can be found in the Examination Library, doc ref SS3, Appendix 9, page 260. Discussions are on going and a further update of this HIA has been undertaken in consultation with Historic England, which will be available during Examination.

Paragraph/Site: **E2333a**

Consultee: **943973 Mr David Newby**

Agent:

Rep ID: **PDLP_AD992**

Soundness - Justified

Insufficient justification to remove the site from the Green Belt Road access is poor and the site is considerable distance from the M1 compared to other employment sites in the area. There are currently vacant units at Clayton West. Development on this site would fundamentally change the character of Clayton West. Impact on wildlife and loss of agricultural land. Opportunities for tourism in the area aligned to sculpture park and light railway. Proposal conflicts with PLP54 and PLP63.

Soundness - Consistent with National Policy

Insufficient justification to remove the site from the Green Belt, in terms of national policy for Green Belts. The proposal conflicts with para 109 and 179 of NPPF

Proposed Change Requested

The degree of harm outweighs the likely benefits by a substantial margin and the site should be withdrawn from the Draft Plan.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b, this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited, the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this area. The Kirklees Light Railway is located approximately 550m from the proposed allocation on the opposite side of the road. The railway line itself does not pass the site and the station is already abounded by industrial development. River Dearne flows along the southern boundary which is a UK BAP priority habitat and there are Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation will be required to be submitted as

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

part of any planning application received. A stand-off around the River Dearne of 1.9Ha has been removed from the developable area, this includes 0.43Ha which is a UK BAP Priority Habitat.

Paragraph/Site: **E2333a**

Consultee: **944899**

Mr Ian Hutchinson

Agent:

Rep ID: **PDLP_AD1406**

Duty to Co-operate

Little or no consultation has been carried out with surrounding authorities to check the availability of more appropriate land 'just over the border'.

Soundness - Positively Prepared

The consultation methodology is flawed. Most of the proposed development sites are included on the plan simply because they were put forward by the land owner and this is not a sound basis for selection and for planning the future of our communities. The Council has done little or nothing to examine the proposed sites to check for suitability in terms of location, access, condition and surroundings. It has simply plotted the sites on a plan. No serious effort has been made to inform the public about 'the public consultation' as there has been no leaflet drop and the plans have not been displayed publicly in local areas. The deadline for comments was around Christmas time, when most members of the public have other things on their minds. There are many more appropriate sites that have not been selected, including many brownfield sites that will be left as eyesores if not re-developed. These should automatically be considered first for inclusion in the plan but some have been rejected for unknown reasons.

Soundness - Justified

E2333a can only be accessed from the north following a drive of around 6 miles or through the narrow roads of Bretton village, joining the A635. This road is already heavily congested with long queues at the roundabout and slow moving lorries will make the situation worse. In winter weather, this road is unsafe road, including the right turn to Emley at the bottom of the hill which means that traffic has to stop suddenly behind vehicles waiting to turn and there are already a lot of serious accidents. High volumes of heavy lorries will increase accidents. A new access would be necessary onto the A635 which is already busy and cannot cope with more delays caused by lorries accessing the site which would be dangerous. It makes more sense for businesses to be located in existing industrial parks, including at Junction 39 which has lots of space and un-let units, Junction 41 and further south alongside the M1. Greenbelt land is supposed to be preserved unless there are absolutely no other alternatives but in this case there are many better alternatives. Industrial units will impact on the attractiveness of the Dearne Valley and many tourists will be unlikely to visit the area. It is impossible for the development to be 'disguised' within the landscape as the land slopes away from the main road and any building would stand out. There are concerns about the impact of noise, air pollution and pollution of water-courses by oil and fuel spills from commercial vehicles. Flooding occurs annually and run off from the fields runs down onto and across the road. The potential for pollution and contamination is abundant. The need for small, local businesses to be able to set up and to expand could easily be accommodated on smaller, more discrete sites locally. The development would result in empty buildings standing idle and the loss of valuable, productive agricultural land.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Part of the site is affected by flood zone 3b; this has been removed from the developable area. An Air Quality Impact Assessment and Noise Impact Assessment would need to be submitted as part of any planning application. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. DTC Response: Please refer to the Duty to Cooperate Statement (SD14) for cross boundary and inter-authority issues, this employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees. The DTC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Kirklees Council met Barnsley Council throughout the Local Plan preparation process (see

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

4.21 to 4.23 in SD14). Barnsley Council did not comment on this site.

Paragraph/Site: **E2333a**

Consultee: **946109 R T Jackson**

Agent:

Rep ID: **PDLP_AD3586**

Soundness - Justified

This is green belt land, why use this green belt land when there is a brownfield site adjacent that is already used for industry? It will scar the approach to Clayton West and the rest of the villages up the valley. It will be a blot on the landscape and seen from miles around. More traffic on already crowded roads. Do we need more industrial buildings?

Council Response

This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. This employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable.

Paragraph/Site: **E2333a**

Consultee: **951075 MISS LYNNE CARROLL**

Agent:

Rep ID: **PDLP_AD635**

Soundness - Positively Prepared

E2333a is a huge Greenbelt site, it is unsound to develop this area into industrial developments where little research has been shown that there is a benefit to the local people and area to destroy the Greenbelt. There are many other brownfield sites available for small scale developments locally and sites nearer the M1/M62 corridor for large scale developments.

Soundness - Justified

The site is in a flood plain. Part of the green corridor and a valuable habitat area. The site is part of a tourist route from Bretton Park to The Last of the Summer Wine Country. Have Wakefield council and the neighbouring villages been consulted with regard to the noise and traffic pollution? Heavy traffic would have to access the already congested rural roads.

Proposed Change Requested

Remove the site from the plan.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. Please refer to the Duty to Cooperate Statement for cross boundary and inter-authority issues, this employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. River Dearne flows along the southern boundary which is a UK BAP priority habitat and there are Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation will be required to be submitted as part of any planning application received. A stand-off around the River Dearne of 1.9Ha has been removed from the developable area, this includes 0.43Ha which is a UK BAP Priority Habitat. Part of the site is affected by flood zone 3b; this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited; the land is such a distance from Bretton Hall that the development would comprise a minor addition within the

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this area. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage.

Paragraph/Site: **E2333a**

Consultee: **964654**

Mr Tristan Scott

Agent:

Rep ID: **PDLP_AD1194**

Soundness - Positively Prepared There are plenty of run down places in and around Huddersfield that need redevelopment.

Soundness - Justified Objection on the grounds that it is a nice quiet area and the development is bigger than the village.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b, this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable.

Paragraph/Site: **E2333a**

Consultee: **968632**

Mrs Dawn Gemmell

Agent:

Rep ID: **PDLP_AD234**

Duty to Co-operate

Cross boundary and inter-authority issues have not been considered. Adjacent Local Authorities have large employment sites in development along the M1. In addition HS2 is likely to promote employment development in other areas, and render this site redundant. The transport impact on West Bretton, Wakefield; a village with narrow roads and proximity to the Yorkshire Sculpture Park have not been considered.

Soundness - Positively Prepared There is no tourism policy in the Local Plan to support this local resource and support the rural economy.

Soundness - Justified

The designation of this site would sterilise the land in perpetuity for employment purposes only. The location of the site and its environs is not suitable for an employment due to its effect on the landscape, due to its prominent visibility and proximity to land allocated as country park and Bretton Hall. Located within 50m of residential housing. The immediate vicinity has historical importance, with medieval monastic bellpits located nearby. Impact on wildlife and migratory birds. The Upper Dearne valley is the gateway to Denby Dale and Holmfirth. The site is situated in close proximity to the Art Triangle, Kirklees Light Railway, Cannon Hall, Bretton Hall and the Coal Mining Museum - impact on tourism. The Kirklees Way is not identified. Increase in noise, light and air pollution. The valley is designated as a green corridor by Natural England.

Soundness - Consistent with National Policy

The entire site is currently in green belt, and the designation contravenes national green belt policies, by further eroding the green spaces between communities.

Proposed Change Requested

Remove the site from the plan.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b; this has been removed from the developable area. An Air Quality Impact Assessment and Noise Impact Assessment would need to be submitted as part of any planning application. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Potential impact on Bretton Hall as a Heritage Asset is

considered to be limited; the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this area. The Kirklees Light Railway is located approximately 550m from the proposed allocation on the opposite side of the road. The railway line itself does not pass the site and the station is already abounded by industrial development. Natural England has identified the River Dearne Corridor as strategic green infrastructure. Development proposals within this area will not necessarily be prevented – the council will seek to ensure that development proposals protect and enhance existing green infrastructure assets. The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. This employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable. DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees Council will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

Paragraph/Site: **E2333a**

Consultee: **968659**

Mrs Lynn Hardy

Agent:

Rep ID: **PDLP_AD111**

Soundness - Justified

This site is so wrong in every way. From traffic, impact on the green belt and the views upon entering the gateway to the valley.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b, this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable.

Paragraph/Site: **E2333a**

Consultee: **968735**

c/o Agent

Agent: **998185**

Mrs Emma Lancaster

Rep ID: **PDLP_AD3102**

Soundness - Positively Prepared

- Support proposed allocation 16.79ha of CWDCL land for employment. However, site smaller area than 25.7ha promoted. Site is unable to deliver scale of development required by market and deemed appropriate in this location by Council to deliver Spatial Growth Strategy and Economic Strategy. - Council have calculated site is capable of delivering 52,115 sq m of employment land. This floorspace density is unlikely to be achievable due to topography and need to create development plateaus. Additional technical information on physical characteristics of CWDCL land demonstrate topography and landscape characteristics have a significant bearing on gross to net development area ratio and density of development achievable. This with the need to deliver a longstanding and defensible Green Belt Boundary means that a significantly larger allocation area is required in order to deliver 52,115 sq m of employment land. - CWDCL feasibility work has shown net developable area of intended allocation likely only to deliver in the order of 35,100- 37,250 sq m of commercial floorspace some 14,865 to 17,000 sq m less than amount required. - JLL's Market Assessment has demonstrated that there is significant latent demand for employment space in this location that, if accommodated on the Site, would create a critical mass resulting in an employment land delivery rate that would warrant an allocation area capable of delivering in the order of 52,000 sq m (565,000 sq ft) to 62,000 sq m (665,000 sq ft). - CWDCL land would if allocated, deliver scale of floorspace for market demand and is deliverable and viable. - Clayton West is distinctive in South Kirklees given prime position on A636 and proximity to M1. Location makes it attractive to regional and national occupiers, sustainable and accessible option for expanding local businesses.

Soundness - Justified

- Proposed allocation will not fully respond to existing negative commuting patterns, Rural Kirklees. Highly sustainable location of site in relation to rest of rural Kirklees and to Clayton West provides opportunity to deliver sustainable employment opportunities. - Need to take account of area's environmental

constraints and sensitivities including topography. CWDCL and land would have better regard to issues than proposed allocation, can be extended without adverse implications. - Proposed policy wording suggests site lies within Flood Zone 3a. Incorrect. No part of proposed allocation or CWDL land lies within Flood Zone 3. - No environmental constraints to development which cannot be overcome. - Landscape character and visual appraisal of CWDCL land confirmed commercial development could take place in such a way magnitude of change would be low, negligible. Grade II Parkland Landscape of Bretton Hall, development of CWDCL land not considered to have any material impact on the character of the parkland, or its setting. Scheduled Monument of Bentley Grange, no material impact upon character or setting.

Soundness - Consistent with National Policy

- CWDCL object to Plan's failure to identify an appropriately sized site that will deliver a flexible, market-facing employment opportunity capable of meeting the objectively assessed business needs of the area in full (as required by NPPF, Paragraphs 17, 20 and 21), addressing current patterns of out migration and supporting the creation of sustainable communities. - Northern boundary of CWDCL land would create a stronger, more defensible Green Belt boundary than proposed boundary which will be inconsistent with strategy for meeting identified requirements for sustainable development. Will need to be altered at end of plan period (or before) (contrary to para 85) to accommodate medium to longer term development needs. Draft Local Plan does not identify any "safeguarded land" between urban area and Green Belt in order to meet longer term needs beyond Plan Period. - CWDL land appropriate, sustainable and deliverable. Promotes sustainable development when assessed against Council's sustainability criteria. Will provide significant amount of new employment floorspace providing new job opportunities locally and address significant out migration from Clayton West and South Kirklees. Will deliver sustainable rural communities in accordance with Council's Spatial Strategy. Conclusion also true for Council proposed allocation to a lesser extent, Council's suggested Green Belt boundary is less able to meet five purposes of Green Belt, does not deliver a defensible long standing boundary to north of site.

Proposed Change Requested

Modify the plan to allocate the entire site shown on the Clayton West Development Company Ltd plan at Appendix 1 of their representation. Modify the site allocation box to show a gross site area of circa 26ha and a net site area of circa 16ha with an indicative capacity in the order of 55,000sqm. Amend the text in 'constraints' to state that part of the site is in flood zone 2, not flood zone 3. Add a sentence in the 'Reports/commentary' box to read "Applications for development of the site for its allocated purpose should be accompanied by" and remove reference to the need for a noise assessment. Amend 'predetermination' archaeological report to 'pre-commencement' archaeological report. Remove reference to 'through sensitive siting of buildings and landscape buffer areas' from 'other site specific considerations'.

Council Response

This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology (.The technical appraisal of this site concurs that there is no overriding constraint that cannot be appropriately mitigated (see background paper BP29, page 11, E2333a) This employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. There is a minor overlap in the south eastern corner of the E2333a with flood zone 3. The site appraisal acknowledges this fact but does not consider this to be a significant constraint due to the small area affected. Option E2333, does not follow any feature on the ground on its northern extent and would leave the adjoining green belt vulnerable to encroachment contrary to the purposes of including land in the green belt. North of Wakefield Road the land rises significantly so there is a high risk of prominent development in long distance views to the detriment of the openness of the green belt.

Paragraph/Site: **E2333a**

Consultee: **969350**

Mrs Charlotte McKay

Agent: **969343**

Mrs Charlotte McKay

Rep ID: **PDLP_AD719**

Duty to Co-operate

Furthermore, we do not consider that the Council have effectively discharged their duty to cooperate with neighbouring authorities. In particular we believe that there are better placed employment sites closer to the M1 within Wakefield and Barnsley which could better accommodate any employment need and we feel that the Council should have worked more closely with these neighbouring authorities in order to look at the potential of the M1 junctions for employment uses. In addition residents in the Wakefield Villages which would be used to access these allocations are unaware of the proposals and this supports our view that there has been insufficient cross boundary consultation on this Local Plan.

Soundness - Positively Prepared

We do not consider that the identified housing and employment needs are based on objectively assessed development requirements. We consider that there

has been an over estimation of the “objectively assessed housing need”; an under estimation of the brownfield land supply; an over estimation of the necessity for green field land allocations; and over estimation of the necessary industrial land allocations; and an over estimation of the necessary green belt land release. The proposed allocation of large areas of Green Belt such as site E2333a, whilst allowing existing employment sites within the area such as H3325a to be re-allocated from employment to housing land is not the most appropriate strategy. There are brownfield sites within the area which could accommodate the proposed development and this would represent a more preferable strategy/approach. The efficient use of brownfield sites should be encouraged and the Local Plan fails to fully explore the brownfield options available. We therefore do not consider that the Publication Version of the Local Plan is justified in accordance with the NPPF.

Soundness - Justified

The proposed allocation would not serve an economic role as the site is not located within the right place to support growth. Site E2333a is located within the Green Belt and within a rural area which lacks infrastructure. There is insufficient infrastructure already and it could not cope with the proposed developments. There appears to be no proposal to improve infrastructure. The proposed allocation would not serve a social role. The proposed allocation is not well serviced and the allocation would not assist in supporting the health, social or cultural wellbeing of current or future occupiers of the area. The proposed allocation would also not serve an environmental role. The allocation would fail to protect or enhance the natural, built and historic environment. In fact we consider that the proposed allocation would have a negative impact on the natural, built and historic environment. Sufficient information is not available to show that the reduction in developable area will be sufficient to protect, conserve and enhance this priority habitat. The site is a haven for wildlife and migratory birds. Deer, foxes, buzzards, owls, Canada geese are all present. There are also lapwings on the corner of the field. Last year 5/6 storks were nesting in the trees next to the river behind Adare. Part of the site is in flood zone 3. The whole of the area suffers from surface water flooding and has been waterlogged during recent bad weather. These issues need to be addressed and in addition it is understood sites in Flood Zone 1 are available. Development would result in the loss of high quality agricultural land. There is a lack of need for the sites and a lot of sequentially preferable sites closer to the M1 at Junctions 36, 37 and 39, therefore if allocated the site would be likely to come under pressure to be changed to residential land. The site is 6 miles from J39 of the M1 and not particularly accessible. Northbound traffic will have to pass through West Bretton on constricted roads.

Soundness - Effective

The Local Plan does not appear to be effective and we question the deliverability of the plan over the plan period.

Soundness - Consistent with National Policy

The proposed Local Plan is aspirational but not realistic as required by the NPPF. The proposed allocations of site H3325a would not represent sustainable development in accordance with the NPPF. The site fulfils the role and function of Green Belt set out in NPPF. The Council have not sufficiently demonstrated why the land should be removed from the Green Belt in accordance with the requirements set out within paragraph 82 of the NPPF and the proposed allocation does not accord with para 84 of NPPF.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. This employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. Wakefield Council were consulted on the publication draft Local Plan and commented in detail, however they did not comment on Site E2333a specifically. The DtC statement (SD14) demonstrates how the Council has complied with its duty-to-cooperate and sets out how the relevant agencies and adjoining authorities have taken part and been involved in the Local Plan preparation process from the outset. The Statement also highlights how these bodies have been engaged, what dialogue has taken place, and the key outcomes of any discussions. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. The Local Plan seeks to encourage the development of brownfield sites but acknowledges that a brownfield only approach will not meet the district's housing and employment land requirements alone, meaning that greenfield and green belt sites and land also need to play a role in meeting these needs. The encouragement of brownfield sites is also set out in Policy PLP3 Location of new development, PLP7 Effective and Efficient use of land and buildings. Paragraph 6.41 of the Publication Draft states that the council will aim to maintain a reasonable supply of brownfield land for new jobs and homes through: the use of Local Development Orders on brownfield sites; the use of Compulsory Purchase orders to help bring forward key sites/areas, where appropriate; the potential relaxations of Section 106 and a review of the CIL charging schedule to help bring forward brownfield land where appropriate; preparation of a brownfield land strategy and masterplans for

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

key brownfield sites;use of funding regimes to remediate/pump prime stalled sites/difficult sites;creation of local housing and employment/enterprise zones where the financial receipt of greenfield development can be reinvested into subsidising brownfield sites (brownfield fund) and infrastructure.Issues in relation to highway safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage.River Dearne flows along the southern boundary which is a UK BAP priority habitat. Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation - including stand-off - is required. As such 1.9ha stand off around the River Dearne has been removed from the developable area, this includes 0.08 ha within flood zone 3b and 0.43 ha that fall within a UK BAP Priority Habitat.Part of the site is affected by flood zone 3b, this has been removed from the developable area.A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development.Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable.

Paragraph/Site: **E2333a**

Consultee: **969413**

Mr Graham Ward-Thompson

Agent:

Rep ID: **PDLP_AD654**

Soundness - Positively Prepared

Don't believe you are co-operating with the local community. Try a local referendum. I guarantee that the majority of local voters (ie the ones truly affect) would vote against your proposals.

Soundness - Justified

The proposals are unsound because they do not take proper account of the dangers to road users of such a significant development on the edge of a village. There can already be significant disruption from traffic trying to access the Halcyon site. This additional development will significantly increase traffic and congestion.

Proposed Change Requested

A cancellation of all proposals for development and a retention of the green belt.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.The employment site has been accepted for the following reasons:Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defendable green belt boundary when considered against the alternatives for this location. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage.The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website.Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan.

Paragraph/Site: **E2333a**

Consultee: **973343**

Paula Kemp

Agent:

Rep ID: **PDLP_AD1452**

Duty to Co-operate

Every village road leads down to the Dearne Valley and the A636 Wakefield Road which is also a major feeder route for the Holme Valley. This road is increasingly busy and congested and to add traffic from the proposed 5,500 new homes in Kirklees Rural is a travesty of National Policy relating to soundness. What consultation has taken place with neighbouring councils of Wakefield and Barnsley?

Soundness - Positively Prepared

The entire exercise has been rushed and contains many inaccuracies, a sizeable majority of Kirklees Rural residents are unaware of what the Local Plan is and the consequences to their communities. Sustainable development should be at the core of any Plan. The allocated locations, topography and road networks throughout this area are totally unsuitable and the proposed developments unsustainable.

Soundness - Justified

To allow the building of an Employment Site E2333a on 40 acres of well farmed agricultural Green Belt as the A636 cuts through the Dearne Valley up towards Bretton and the Yorkshire Sculpture Park is completely inappropriate, unsound and contravenes a great number of requirements within Paragraph 182 of the NPPF. High level environmental stewardship by generations of the same farming family combined with the Dearne Valley being designated a 'green corridor' have preserved a stunning vista and promoted a significant natural habitat for many protected species.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Consistent with National Policy	The Plan is inconsistent with or directly contravenes National Planning Policy Framework.
Council Response	No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Please refer to the Duty to Cooperate Statement for cross boundary and inter-authority issues, this employment allocation contributes to meeting the objectively assessed jobs need (OAN) and the employment land required to support the jobs within Kirklees, which is set out in the Employment Needs Assessment Technical Paper. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited; the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this area. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website. DTC Response: At a meeting on 17th February Wakefield Council confirmed that they consider Kirklees to have complied with the duty to cooperate. In relation to the preparation of highways and transport evidence, Wakefield is now satisfied that Kirklees have recognised the impacts upon Wakefield's network. With respect to highway impacts at the A636/A637 roundabout junction, Wakefield Council recognises that the highway network will experience significant congestion in 2030 without the Kirklees Local Plan site allocations, however it is also recognised that the site allocations will add to this issue. However Wakefield Council does acknowledge that there is a reasonable prospect that highway improvements could be provided. As such, Kirklees will work with Wakefield Council over time to discuss cross-boundary infrastructure and traffic impact issues.

Paragraph/Site: **E2333a** Consultee: **1047137 Dr Neil Denby** Agent: Rep ID: **PDLP_AD208**

Soundness - Positively Prepared	NPPF Para 150 – The Draft Local Plan should ‘reflect the visions or aspirations of the local community’. The Dearne Valley is one of just 12 Nature Improvement Areas, established in 2012 with funding from Defra, to help protect wildlife and connect people with nature, while providing a boost to rural economies.
Soundness - Justified	NPPF Para 100. The site is in an area at risk of flooding or which forms flood plains for rivers, particularly in the Dearne Valley. Building is proposed on wetland areas and sumps that mitigate flooding lower down the valley and reduce the flood risk to the A636. NPPF para 128. The north end of the site will be prominent and visible from Bretton Country Park thus proving detrimental to it and the Yorkshire Sculpture Park (a heritage asset).
Soundness - Effective	NPPF Paragraphs 114 and 119 – The site contravenes UK BAP Priority Habitats. NPPF Paragraphs 120 and 121 – the site is in a ‘high coal risk’ location.
Soundness - Consistent with National Policy	The site does not comply with the following NPPF paragraphs; 14,100,114,119,120,121,128,150,
Proposed Change Requested	Remove this site from the Plan and, if industrial allocation is really thought necessary, replace it with the brownfield areas that are close to it but which have not been considered.
Council Response	No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b, this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Site promoter has indicated that the quantum of land would make the employment allocation viable and deliverable. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited,

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existig landscape quality and as such would not have an impact on tourism within this area.Coal Mining Risk Assessment will be required to be submitted as part of any planning application received.River Dearne flows along the southern boundary which is a UK BAP priority habitat and there are Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation will be required to be submitted as part of any planning application received. A stand-off around the River Dearne of 1.9Ha has been removed from the developable area, this includes 0.43Ha which is a UK BAP Priority Habitat.

Paragraph/Site: **E2333a**

Consultee: **1048793 Cllr Graham Turner**

Agent:

Rep ID: **PDLP_AD355**

Soundness - Justified

The proposal to use green belt on the northern side of the A636 is unreasonable use of the green belt. Site topography means any development will be overbearing and destroying skyline on main gateway to Clayton West.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.The employment site has been accepted for the following reasons:Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location.A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development.

Paragraph/Site: **E2333a**

Consultee: **1049226 Mr James Medcalf**

Agent:

Rep ID: **PDLP_AD439**

Soundness - Positively Prepared

Consultation at the early stages did not mention plans for housing on this site. Since then, there have been no letters to residents or other means of communication detailing the plans. There has been little opportunity to object to the plan.

Soundness - Justified

The land was given to the people of Clayton West, with the intention of being open space for the community to enjoy. The countryside and the views it offers are enjoyed by families, walkers and dog walkers. There has been no concern for the community who have been here for generations.

Proposed Change Requested

Reject site E2333a from the plan.

Council Response

No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology.The employment site has been accepted for the following reasons:Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location.A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development.There has never been an option for housing on this site. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website.Three early engagement exercises were undertaken to inform the plan prior to consultation on the Draft Local Plan in accordance with NPPF paragraph 155. Feedback reports on early engagement were published on the website and form part of the council's Statement of Pre-Consultation. This document provides full details on the consultation process and how comments were considered as part of the preparation of the Publication draft Local Plan.

Paragraph/Site: **E2333a**

Consultee: **1049391 Miss Lucie Jennings**

Agent:

Rep ID: **PDLP_AD757**

Soundness - Justified

I object to planning being accepted here as it will clearly have a detrimental effect on the local wildlife and habitat (this site is within a UK BAP priority zone). There are no safeguards in place for flooding here either. The local infrastructure has no capacity to deal with this proposal. There are too many concerns listed here for this proposal to be beneficial in the long term.

Proposed Change Requested

To remove E2333a from the Local Plan

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Council Response No change. This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. River Dearne flows along the southern boundary which is a UK BAP priority habitat. Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation - including stand-off - is required. As such 1.9ha stand off around the River Dearne has been removed from the developable area, this includes 0.08 ha within flood zone 3b and 0.43 ha that fall within a UK BAP Priority Habitat.

Paragraph/Site: **E2333a**

Consultee: **1049950 Mrs Elizabeth Willoughby**

Agent:

Rep ID: **PDLP_AD751**

Soundness - Positively Prepared This is farm land a green field site not a brown field industrial site. There was no previous consultation that I was made aware of.

Proposed Change Requested This should remain farm land.

Council Response No change. This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. Exceptional circumstances can be demonstrated for the need to release land from the green belt to accommodate B2 - with an element of B8 - operations that could not otherwise meet the needs of the industry within the existing settlements of Kirklees. This option presents a suitable location to meet the needs of businesses within the south of the district. Site option has a more defensible green belt boundary when considered against the alternatives for this location. The council's Statement of Community Involvement sets out when, how and with whom it consulted as part of the development of the Local Plan. The council considers that the approaches set out are compliant with regulatory and NPPF requirements. All comments were considered as part of the pre-submission process and published on the council's website.

Paragraph/Site: **E2333a**

Consultee: **1059521 Mr Jacob Brook**

Agent:

Rep ID: **PDLP_AD1317**

Soundness - Justified Lack of an alternative for this site (E2333a) is not a valid reason for the plan to go ahead. Traffic congestion and associated pollution concerns would be worse including queues through Denby Dale, Scissett, Clayton West and to Bretton roundabout. Unaccepted visual impact of the development on a valued landscape. Loss of wildlife habitat including impact on protected species. Negative impact on the sculpture park. The site is in a flood zone and loss of agricultural land and building on the site will cause further flood risk.

Soundness - Consistent with National Policy The plan does not comply with NPPF.

Council Response No change required - This is a new site option and has been put forward as an alternative boundary to E2333 which previously accepted as an employment allocation in the Draft Local Plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The employment site has been accepted for the following reasons: The evidence shows that there are no suitable alternative sites within South Kirklees that could accommodate the scale or type of commercial development that is necessary to deliver growth aspirations. Issues in relation to highways safety have been considered and deemed acceptable at this location. However, appropriate mitigation would be agreed at the detailed planning application stage. Part of the site is affected by flood zone 3b; this has been removed from the developable area. A landscape impact assessment has been undertaken by the site promoter and recommendations put forward to which demonstrates that appropriate levels of mitigation can be implemented to off-set the impact of development. Potential impact on Bretton Hall as a Heritage Asset is considered to be limited; the land is such a distance from Bretton Hall that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality and as such would not have an impact on tourism within this area. River Dearne flows along the southern boundary which is a UK BAP priority habitat and there are Species of Principal Importance along the river therefore a protected species survey and appropriate mitigation will be required to be submitted as part of any planning application received. A stand-off around the River Dearne of 1.9Ha has been removed from the developable area, this includes 0.43Ha which is a UK BAP Priority Habitat.

Paragraph/Site: **E1866**

Consultee: **969134 Mr Merlin Ash**

Agent:

Rep ID: **PDLP_AD3829**

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Legally Compliant Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Natural England advise that, unless robust evidence can be found which clearly demonstrates that the allocations are in areas that are not used by South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA birds, then bird surveys will need to be undertaken at all of the sites considered in table 4.4 of the Habitats Regulations Assessment report. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Soundness - Justified Natural England disagrees with the screening assessments in table 4.4 of the Habitats Regulations Assessment (HRA) report with regards to the following sites as we do not consider that there is sufficient certainty or evidence to rule out likely significant effects on the South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA with regards to loss of functionally linked land for golden plover and curlew. Natural England advise that, unless robust evidence can be found which clearly demonstrates that the allocations are in areas that are not used by South Pennine Moors Phase 2 Special Protection Area (SPA) and Peak District Moors (South Pennine Moors Phase 1) SPA birds, then bird surveys will need to be undertaken at all of the sites considered in table 4.4 of the Habitats Regulations Assessment report. Appendix 4 identifies habitat on site suitable for golden plover. Natural England advise Allocations should be screened through the Appropriate Assessment stage. For further correspondence relating to this representation see Core Document 'Correspondence received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation'.

Proposed Change Requested Natural England advise Allocations should be screened through the Appropriate Assessment stage.

Council Response No change required. Following the Regulation 19 Publication Draft Local Plan Consultation which closed on 19th December 2016, further engagement has taken place between the council and Natural England and these issues have now been resolved. NE now consider the HRA is legally compliant. Further details are set out in Correspondence Received from Statutory Consultees after the Regulation 19 Publication Draft Local Plan Consultation April 2017 (BP28) Appendix B, and the revised Publication Draft Local Plan Habitats Regulation Assessment March 2017 (SD10), including Appendix 1 of the report setting out a schedule of comments and responses. In summary, Natural England's revised response welcomes the clarifications made in the Habitats Regulations Assessment March 2017 and the modification to the supporting text of policy PLP 30. Natural England is content with the conclusions of the HRA, i.e. that the plan will not have adverse effects on the integrity of the South Pennine Moors Phase 2 Special Protection Area (SPA) or the Peak District Moors (South Pennine Moors Phase 1) SPA as a result of the loss of functionally connected land for SPA birds. The revised wording to paragraph 13.10 agreed with Natural England is set out in the proposed minor modification SP-MM25 in document Proposed Modifications to the Local Plan (SD4).

Paragraph/Site: **E1871** Consultee: **955332 Mr Robert Barnes** Agent: **941969 Mr Robert Barnes** Rep ID: **PDLP_AD1131**

Soundness - Justified The site should be extended to include the triangular plot to the left. Development of the site would facilitate development on the land adjacent. The allocation should allow greater flexibility for the development of Site E1871 for employment generating uses where this would help support development on KR11

Proposed Change Requested Site E1871 should be extended to also include the triangular plot to the west of the site access / south of Woodhead Road.

Council Response No change required - The site is proposed as an accepted employment allocation. It formed an accepted employment allocation in the draft local plan (November 2015). Its allocation is considered consistent with the council's site allocation methodology. The triangular area of vacant land referred to falls within an Priority Employment Area (PEA) and as such an employment use on this land would be acceptable. The PEA designation provides a greater degree of protection to prevent unnecessary changes of use and to keep the land within an employment use.

Paragraph/Site: **B&S15** Consultee: **1049845 Ms Jane Scott** Agent: Rep ID: **PDLP_AD780**

Soundness - Justified The designation of B and S 15 as a PEA cannot be justified by the criteria set for this policy. It is an isolated, poor site, severely constrained. It is not supported by evidence. Its designation undermines the designation of appropriate areas. Buildings on the site were put up in an incremental way leading to over development of the site and a loss of amenity for adjoining residential properties. Current buildings are a considerable scale and highly obtrusive and objectionable.

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

Soundness - Consistent with National Policy The designation of B and S 15 as a PEA is not consistent with national policy

Proposed Change Requested Delete PEA designation B&S15

Council Response No Change Site B&S15 has been assessed in line with the methodology as set out in the Priority Employment Areas technical paper. This was informed by national policy and local evidence. In particular NPPF paragraphs 21-22 states that planning authorities should identify priority areas for employment and NPPF paragraph 157 (bullet 6) states that it may be appropriate to limit freedom to change the use of buildings ; however such restrictions must be supported with a clear explanation. The Priority Employment Areas technical paper sets out this justification and concluded that site B&S15 should be safeguarded on the basis that the site comprises of modern business and industrial units which meet the needs of modern day business operations. Although the site is relatively small, recognition has also been afforded to its close proximity to the motorway network and other business parks including Oakwell Industrial Park, Birstall and Treefield Industrial Estate, Gildersome

Paragraph/Site: **B&S3** Consultee: **1053800** Agent: **1053797** **Mr James Beynon** Rep ID: **PDLP_AD1963**

Soundness - Justified - The warehouse element functions as an intrinsic part of IKEA's operations (A1 use) and not as a traditional employment/warehouse (i.e. B8). It cannot, nor is it intended to, function independently and separate from the store itself

Soundness - Effective Sites within Priority Employment Areas are bound by draft Policy PLP8. This outlines an in-principle support for employment generating uses (i.e. within the B Use Class) and sets the applicable tests for non-employment development if proposed. Retail uses (A1) such as IKEA, including its integral warehouse, does not fall within the traditional B Use Classes. Designation therefore places an unnecessary restriction over development.

Proposed Change Requested Removal of the IKEA warehouse from Priority Employment Area reference B&S3 and the boundary amended accordingly.

Council Response No change. The Priority Employment Area designations and associated policy PLP 8 are supportive of employment generating uses within them. The wording of the policy uses the term 'employment generating uses' so as not to exclude those operations falling outside of the traditional employment B Use Classes. In view of this, and taking account of the nature and characteristics of the warehouse operation, it is considered appropriate and consistent with policy PLP 8 to retain the IKEA warehouse element within the PEA designation B&S3. Due to the supportive nature of the Priority Employment Area designation towards employment generating uses it is considered not to be restrictive to the IKEA warehouse development.

Paragraph/Site: **B&S4, B&S16, B&S3, B&S15** Consultee: **978303** **Cllr Andrew Palfreeman** Agent: Rep ID: **PDLP_AD2522**

Council Response SUPPORT - No change required, support for allocation of PEA's B&S4, B&S16, B&S3, B&S15 noted.

Paragraph/Site: **Table Batley & Spen** Consultee: **1045848** **Mrs Toni Rios** Agent: **1045846** **Mr Christopher Yapp** Rep ID: **PDLP_AD376**

Council Response No change required - support for PEA allocation noted.

Paragraph/Site: **HUD23** Consultee: **1061172** Agent: **968969** **Miss Clare Plant** Rep ID: **PDLP_AD2250**

Soundness - Positively Prepared Object to the designation of Site HUD23 as a PEA should be identified as an Employment Area in order to ensure compliance with the National Planning Policy Framework (the 'Framework) and provide adequate flexibility to enable alternative uses on the site should this be necessary in the future.

Soundness - Justified Site HUD23 should be removed from the Green Belt as the land is not open and does not perform a Green Belt role and function in compliance with the National Planning Policy Framework.

Soundness - Consistent with National Policy Site HUD23 should be removed from the Green Belt as the land is not open and does not perform a Green Belt role and function in compliance with the National Planning Policy Framework. Site HUD23 should be identified as an Employment Area in order to ensure compliance with the National Planning Policy Framework (the 'Framework) and provide adequate flexibility to enable alternative uses on the site should this be necessary in the future. The plan can only be found sound if the Green Belt designation is removed and the site allocated as a general Employment Area.

Proposed Change Requested On the basis of the above, the recommendation is: Remove site HUD23 from Table Huddersfield Priority Employment Areas (pg 22 of Allocations and designations document. Add site HUD23 to the list of Employment Allocations in 'Section 2.1 Huddersfield Sub-Area' of the Allocations and Designations

Representations received on the Kirklees Publication Draft Local Plan PDLP Allocations & Designations

document. Amend the Proposals Map to identify site HUD23 as an 'Employment Area'.

Council Response

No change to PEA designation - Areas designated as PEAs have been afforded protection from proposed changes of use to non-employment generating uses. Doing so will help provide a clear direction for existing and future businesses wanting to grow and expand from their current location. This is a less restrictive designation than an employment designation would be as it allows for some flexibility in uses. In any case as this site is an already established business, it would not be allocated as an employment site. HUD23 is considered to be locally significant in terms of helping to meet locally arising employment needs and is therefore considered to meet the criteria to be designated as a PEA. Please refer to the PEA's Technical Paper for the full assessment.

Paragraph/Site: **Table Kirklees Rural**

Consultee: **978506**

Cllr **Nigel Patrick**

Agent:

Rep ID: **PDLP_AD3605**

Soundness - Justified

Existing employment sites within Holmfirth should be protected and not allocated for housing.

Proposed Change Requested

Allocate existing employment sites as PEAs and remove housing allocations.

Council Response

No change. Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and reflecting green belt purposes. Existing employment areas have been retained, to enable jobs to be provided in locations which are close to residential areas and reasonably accessible by public transport and to relieve the pressure to replace existing employment with housing. Locations with concentrations of business uses which constitute the main employment areas in Kirklees outside town centres, taking into account both scale and location, have been identified as Priority Employment Areas (PEAs), these are shown on the Policies map (SD3) and listed in the Strategy & Policies document (SD1). These areas will be safeguarded for continued employment use. Only one existing employment area in Holmfirth and Holme Valley South that has been lost to housing as part of the local plan process, but historically there may be more. 28 PEAs have been designated in the Kirklees Rural area, please see the PEA's Methodology Paper for more information (BP8).

Paragraph/Site: **Table Kirklees Rural**

Consultee: **1050803**

Cllr **Kenneth Sims**

Agent:

Rep ID: **PDLP_AD3688**

Soundness - Justified

Existing employment sites within Holmfirth should be protected and not allocated for housing.

Proposed Change Requested

Allocate existing employment sites as PEAs and remove housing allocations.

Council Response

No change. Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and reflecting green belt purposes. Existing employment areas have been retained, to enable jobs to be provided in locations which are close to residential areas and reasonably accessible by public transport and to relieve the pressure to replace existing employment with housing. Locations with concentrations of business uses which constitute the main employment areas in Kirklees outside town centres, taking into account both scale and location, have been identified as Priority Employment Areas (PEAs), these are shown on the Policies map (SD3) and listed in the Strategy & Policies document (SD1). These areas will be safeguarded for continued employment use. Only one existing employment area in Holmfirth and Holme Valley South that has been lost to housing as part of the local plan process, but historically there may be more. 28 PEAs have been designated in the Kirklees Rural area, please see the PEA's Methodology Paper for more information (BP8).

Paragraph/Site: **Table Kirklees Rural**

Consultee: **1050805**

Cllr **Donald Firth**

Agent:

Rep ID: **PDLP_AD3687**

Soundness - Justified

Existing employment sites within Holmfirth should be protected and not allocated for housing.

Proposed Change Requested

Allocate existing employment sites as PEAs and remove housing allocations.

Council Response

No change. Overall a balance needs to be struck between providing local employment opportunities, promoting sustainable patterns of development and protecting the character of the countryside and reflecting green belt purposes. Existing employment areas have been retained, to enable jobs to be provided in locations which are close to residential areas and reasonably accessible by public transport and to relieve the pressure to replace existing employment with housing. Locations with concentrations of business uses which constitute the main employment areas in Kirklees outside town centres, taking into account both scale and location, have been identified as Priority Employment Areas (PEAs), these are shown on the Policies map (SD3) and listed in the Strategy & Policies document (SD1). These areas will be safeguarded for continued employment use. Only one existing employment area in Holmfirth and Holme Valley South that has been lost to housing as part of the local plan process, but historically there may be more. 28 PEAs have been designated in the Kirklees Rural area, please see the PEA's Methodology Paper for more information (BP8).