

Kirklees Local Plan Examination

Stage 4 hearings Other Site Allocations

GENERAL MATTERS (Matter 27)

Council Response

25 January 2018

Matter 27 – Strategic employment allocations: Green Belt releases

- 1.1 This statement sets out the council's responses in relation to the Inspector's matters and issues Matter 27 - Strategic employment allocations: Green Belt releases. All the documents referred to in this statement are referenced within the main body of the statement.
- 1.2 The modifications proposed in this document have been provided to assist with the discussions at the hearings for this matter and have not been subject to sustainability appraisal testing or public consultation. Should it be necessary to make any of the modifications these will be added to the full schedule of modifications to the Local Plan which will be made available for comment and subject to sustainability appraisal at a later stage of the Examination in Public, subject to the delegated powers agreed by the council's Cabinet.

Issue – Are the proposed strategic employment allocations justified, effective, deliverable and consistent with national policy?

E1831 – land to the north and west of The Royds, Whitechapel Road, Cleckheaton (41,020 m²)

a) What type of employment uses would be supported on the site? Is the indicative floorspace capacity justified and deliverable?

- 1.3 Refer to MIQ response to Matter 26 l) and m).
- 1.4 In principle, all B use class operations would be supported on this site. Proposals for office use would be subject to the sequential test unless it can be proven to be ancillary to the primary operation.
- 1.5 E1831 is a strategic employment allocation, required to meet the needs of the manufacturing industry, particularly advanced manufacturing and precision engineering (Use Class B2) to assist in the delivery of the Leeds City Regions and Kirklees Council's economic objectives.
- 1.6 As such, the use class ratio (B1a=10%, B1b=10%, B1c=10%, B2=60%, B8=10%) as discussed in Matter 26 m) has been applied to determine the indicative floorspace capacity. This capacity is provided in the site text box (41,020 sq. m) and is based on a net site area taking into account the non-developable area, as a high pressure gas pipeline crosses the site.

- 1.7 The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber 'Translating Jobs into Land' study by Roger Tym & Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.

Proposed Modification:

Employment allocations Site E1831 Net site area (ha) delete: 24.57 and replace with '11.72 - developable area reduced to take into account high pressure gas pipeline'

b) How does the site fit with local and sub-regional economic strategy?

- 1.8 The Kirklees Economic Strategy (KES) sets the following vision for the district:

"Our vision for Kirklees to be recognised as the best place to do business in the North of England and one where people flourish in all of our communities".

- 1.9 The KES sets five priorities to deliver this vision all of which can be supported through site allocations of strategic significance to assist the growth of business and industry. These priorities are:

- **Precision engineering and innovative manufacturing:** strength in depth and excellence;
- **Innovation and enterprising businesses:** championing creativity, entrepreneurship and resilience;
- **Workforce, skills and employment:** extending opportunities and powering business success;
- **Infrastructure:** making it easier for businesses to succeed and for people to access work; and
- **Quality places:** locations of choice for people, business and investment.

- 1.10 Paragraph 2.21 of the Employment Technical Paper (SD22) clarifies that the KES targets growth of the engineering and manufacturing sector (Priority One) through a range of measure including the need to provide major new sites and developments, better links to innovation assets and supply chains. The KES (LE6) also recognises the diverse nature of Kirklees and the requirement for a varied approach (page 1, paragraph 6, KES Summary).

- 1.11 Six headline initiatives have been identified as having the potential to drive forward this transformational change. These headline initiatives are large scale investments and will require integrated action across stakeholders to ensure delivery. Two of the key six headline initiatives include the need to 'consolidate Kirklees as the heart of a growing innovative manufacturing and engineering cluster in the LCR' and to deliver 'strategic employment sites to stimulate jobs and growth, with focus on manufacturing and engineering' (KES Summary (LE6) page 2, The Six Headline Initiatives).

- 1.12 The KES also aligns its priorities with the Leeds City Region Strategic Economic Plan (LCR SEP) (CR9) and in particular intends to be at the forefront and lead with a focus on innovative manufacturing. The LCR SEP (CR9) recognises a number of the key assets for the city region which includes research and development and innovation

assets and a manufacturing workforce of around 140,000 placing the city region at the heart of the UK's advanced manufacturing and engineering industry (page 44).

- 1.13 Page 32 of the LCR SEP (CR9) identifies Kirklees as having strong commuting and business connections with Leeds and relationships with neighbouring authorities such as Calderdale, Bradford and Wakefield in addition to important links to Manchester and Sheffield. Assets of the Kirklees district which are of city regional importance include world leading engineering and textile businesses, cutting edge innovation and creative businesses. Recognition is also afforded to the fact there are major employment growth opportunities at Cooper Bridge and Chidswell and through the M62 Enterprise Zone sites at Lindley Moor and Mirfield.
- 1.14 LCR SEP Priority 4 (page 75, Infrastructure for Growth) seeks to support the City Region to grow and compete globally through a range of Key Action Areas. Key Action Area (A) (Integrated Spatial Priority Areas) includes key action (Aiii) which focuses on employment growth areas (including mixed use employment sites and enterprise zones). The priorities for key action (Aiii) include:
- Accelerate delivery of employment growth areas and supporting infrastructure to facilitate sustainable job growth;
 - Identify and deliver upfront infrastructure to tackle development constraints; and
 - Deliver a comprehensive inward investment and marketing solution for all Leeds City Region Enterprise Zones.
- 1.15 The SEP has a place-based focus which applies an integrated set of Spatial Priority Areas. These are set out on page 77 and identify Chidswell (22), Cooper Bridge (25) and Lindley Moor East and Lindley Moor West as Employment Growth Areas. These are also listed in the table on page 79. Included within these Employment Growth Areas are the City Regions Enterprise Zones and includes the M62 Corridor Enterprise Zone capturing sites within Kirklees (page 80).
- 1.16 These new Enterprise Zones capitalise on existing concentration of manufacturing businesses within West Yorkshire, maximising the value of the M62 Corridor as a strategic location ideally suited to facilitate access to a wide pool of skilled workers and has the potential to deliver approximately 100 hectares of new employment land for the advanced and innovative manufacturing sector (page 81).
- 1.17 Site E1831 will play a significant role in supporting the growth objectives of both the KES and LCR SEP. In particular site E1831 is well placed to take advantage of access to the M62, is accessible to a skilled workforce and is of a scale which will support the growth aspirations of precision engineering and advanced manufacturing. Sites of this nature have been identified as being critical to the delivery of the objectives of both the KES and LCR SEP where it is stated that strategic employment sites will play a key role in supporting the growth aspiration for this sector (KES Summary (LE6) page 2, The Six Headline Initiatives) and (LCR SEP (CR9) Priority 4, page 75, key action (Aiii)).
- 1.18 The LCR SEP also recognises the opportunity for capitalising on the concentration of manufacturing businesses within West Yorkshire, and in particular maximising the value of the M62 Corridor. As a strategic location it is ideally suited to facilitate access to a wide pool of skilled workers and an ideal area to deliver new employment land to meet the growth aspirations of the advanced and innovative manufacturing sector (CR9, page 81). Site E1831 is an ideal site to meet each of these objectives set out in both the KES and LCR SEP.

c) How was the site selected and its boundaries determined?

- 1.19 Site E1831 was put forward as an employment site option by the site promoter through the Council's call for sites exercise. This process is set out in the Local Plan Methodology Statement Part 2 (BP23, page 5, paragraph 3.1, bullet 1).
- 1.20 The site was then considered in line with the methodology set out for development site options in document BP23 at paragraphs 4.15 to 4.63, pages 9 to 21.
- 1.21 Supply within the urban area was identified in the first instance and a critique of this supply was undertaken to understand its role and function. This approach has been set out in the Employment Technical Paper (SD22) at paragraphs 6.19 to 6.27, pages 34 to 38. The conclusions of this exercise determined there to be insufficient land supply within the urban area to meet the OAN derived land requirement and also concluded, from a qualitative perspective that supply within the urban area was not of a sufficient scale or well-located to meet the growth objectives of the manufacturing and engineering sector. This supply also fails to support the economic objectives of the both the KES and the SEP.
- 1.22 Consideration was afforded to the objectives of both the KES and the LCR SEP and priority would be given to those sites that met the criteria set out within these economic strategies - see response to Matter 27, question b) for a summary of these criteria. It was concluded that site E1831 performed strongly against these requirements.
- 1.23 Sites that performed well against the objectives of both the KES and the LCR SEP which did not have any absolute constraints identified through the technical site assessment, and where no better alternatives were identified were put forward as draft allocations.
- 1.24 The boundary has been determined by taking account of the need to bring forward a quantum of land that can assist in meeting the employment land requirement and the objectives set out in the KES and the LCR SEP. The site boundary has been established by following physical features on the ground to ensure the new green belt boundary can endure beyond the Local Plan period as required by NPPF, paragraph 85.

d) Where relevant, has the impact of the proposal on heritage assets been adequately assessed and addressed?

- 1.25 Historic England and WYAAS have been consulted and there is no significant heritage or archaeological issues in relation to this site.
- 1.26 The submitted archaeological evaluation concludes that the site has historically been used for agricultural purposes and remains undeveloped to the present day. The archaeological desk-based assessment has established that there is low potential for archaeological remains within the proposed site allocation. However, a geophysical survey of arable fields within the proposed development site is recommended. This would be a detailed matter to be addressed at the planning application stage.

e) Does the Plan provide sufficient detail regarding the location and extent of any non-developable areas or buffer zones required to protect residential amenity/biodiversity/historic assets/highways works?

- 1.27 The plan provides sufficient detail regarding the location and extent of any non-developable areas or buffer zones and an indicative capacity is provided (41,020 sq. m). This capacity is based on a net site area taking into account a non-developable area, as a high pressure gas pipeline crosses the site. This has been represented on the indicative masterplan (SS11).
- 1.28 The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.
- 1.29 Policy PLP5 of the Local Plan requires that masterplans be submitted prior to the submission of a planning application. This is an appropriate mechanism to define the location and extent of any non-developable areas or buffer zones.

Residential Amenity

- 1.30 The plan provides sufficient detail regarding the location and extent of any non-developable areas or buffer zones required to protect residential amenity. The site text box states that residential amenity will need safeguarding through sensitive siting of buildings and landscape buffer areas. The council consider that this could be achieved at planning application stage or through a masterplan.

Biodiversity and historic assets

- 1.31 No significant biodiversity issues or issues in relation to historic assets that would reduce the developable area have been identified.

Highways

- 1.32 The Publication Draft Local Plan contains a specific policy on masterplanning which sets out the requirements of a masterplan. Agreed masterplans will be used as the basis by which planning applications submitted on that site will be determined.
- 1.33 Policy PLP 5, Masterplanning Sites states: "Masterplans must involve the all relevant stakeholders, including the council, landowners, developers, the local community, service providers and other interested parties. Masterplans will be developed in consultation with the council prior to the submission of a planning application. "
- 1.34 In broad terms, masterplans provide design guidance for areas that are likely to undergo some form of change. They will describe and map the overall vision and concept for the proposed development including proposed land uses, urban design, landscaping, built form, movement and access and infrastructure and service provision providing a clear and cohesive framework for development. They will also set out the intended implementation and phasing of development.
- 1.35 Local and Strategic highway schemes to support the delivery of the Local Plan are emerging and developing in conjunction with the progression of the Local Plan. In some cases the final design is not yet finalised. The Council considers that the masterplanning policy allows for detail on **any** highway schemes and therefore

associated non-developable areas and/or buffer zones to be provided at the time of application.

- 1.36 The Council considers that Policy TS9 in the plan provides enough information to alert potential developers that a site might be subject to certain constraints as a result of proximity to a strategic transport scheme. The following provides further detail around the strategic scheme in TS9 and what information has been provided in the orange site allocation boxes in the Allocations and Designations Document.
- 1.37 There is no requirement to provide detail regarding the location and extent of any non-developable areas or buffer zones required for Highway works as there are no strategic highway works planned either by the Local Highway Authority or Highways England that require any of the land allocated. However, Kirklees Highways team has expressed the need to ensure there is an internal link from within the allocation to the Spen Valley Greenway - this has been represented in the indicative masterplan (SS11).

f) Are other constraints such as highways, flood risk, landscaping, drainage and power lines suitably mitigated through Part 2 of the Plan?

- 1.38 The Council considers that the plan provides clear guidance on the requirements and constraints. Pages 10 and 11 of the Allocations and Designations document (SD2) list the constraints and the reports that may be required to accompany the submission of a planning application. Other site specific considerations are also listed along with mitigation measures.
- 1.39 Highways, drainage, flood risk, contamination, noise, odour, air quality, archaeology, biodiversity and protected trees are all listed as constraints, none of which are considered to be significant. The reports that would be required to address these constraints are also listed along with mitigation measures relating to highways, landscape, residential amenity and the strategic road network. Site constraints identified in Part 2 of the Local Plan are discussed below:

Highways

- 1.40 TS1, TS2, TS3, TS4, TS5, TS8, TS9, TS10 and TS11 show in strategic terms what transport infrastructure is required to ensure that the district can accommodate the cumulative impact of the development traffic from the Plan's site allocations. From the perspective of viability it cannot be expected that individual sites could fund the level of infrastructure provided, so policy PLP4 in the Strategy and Policies Document exists to ensure that at application stage, due regard is taken of the infrastructure required under the TS designations and that developments should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL).
- 1.41 With respect to local highway constraints, the Council considers that that level of detail will be dealt with and discussed at pre- planning application, where at that point in time a better understanding will be had of what committed developments are in the local area, what the progress is of the larger strategic schemes and at what point they might be implemented.
- 1.42 The council and Highways England agree that there are no Strategic Road Network constraints that require mitigation through Part 2 of the Plan. This is established

within the Kirklees Council and Highways England Joint Position Statement (SC008 18-01-18). It outlines that Modification AD-MM4 with regard to E1831 is not necessary and should be amended to just delete wording rather than replace it. This is due to the fact that E1831 is modelled by Highways England as generating a less than significant impact on the Strategic Road Network (including at Junction 26 of the M62/M606 - Chain Bar) at a predominant B2 or B8 mix of Use Classes. The site allocation box for E1831 in Part 2 of the Plan requires a Transport Assessment to be carried out at application stage. The council will expect this to assess whether there are any Strategic Road Network constraints at the time of application and to identify how these constraints (if present) could be suitably mitigated through a Travel Plan or other measures. Policy PLP 4 enables the Council to seek contributions towards additional mitigation measures from applications upon allocations that do not in themselves generate a significant impact upon the Strategic Road Network (i.e. E1831) if a Transport Assessment deems it necessary. These contributions would be sought in accordance with Paragraphs 204 and 173 of the NPPF.

- 1.43 In terms of the local highway network, there are no significant outstanding issues. Kirklees Highways team has expressed the need to ensure there is an internal link from within the allocation to the Spen Valley Greenway - this has been represented in the indicative masterplan.
- 1.44 HGV access should be avoided from Whitechapel Road, which should be directed to Whitehall Road. The submitted Transport and Access Appraisal confirms there to be no significant impact to the highway network and that access is achievable.

Flood Risk and Drainage

- 1.45 This is not considered as significant and could be addressed as part of a detailed planning application. The site falls within Flood Zone 1 as defined by the EA Flood maps. The area of the site to be developed is not at risk of flooding from river or tidal water up to a 1% return period. The submitted drainage and flood risk assessment (SS11) confirms that flood risk is considered to be acceptable for commercial light industrial development.
- 1.46 The site is shown to be at risk of flooding from surface water in a small area of the site. The submitted drainage and flood risk assessment considers this to be an extreme condition and whilst occupiers should be informed of the risk it is considered to be very low. The floor levels of the proposed buildings should be a minimum of 300mm above the existing ground level.
- 1.47 The site allocation constraints box for E1831 (SD2, page 10) recognises that there is potential need to cross third party land to achieve drainage solutions. These solutions include access to the public watercourse to the north of the site and to the sewer under the public highway also in the north. Further investigation would be required in relation to the east of the site, however this is not considered as a significant constraint to development.

Environmental Health

- 1.48 Most of the site falls within an HSE outer hazard zone please refer to MIQ response to Matter 26 g). A small part of the site is affected by the route of a high pressure gas pipeline and as already demonstrated by the indicative masterplan (SS11); this can be mitigated against and has been removed from the developable area. In terms of noise impact, the submitted noise impact assessment has concluded that subject to appropriate mitigation, noise levels would be negligible.

Biodiversity

- 1.49 There are a number of protected trees along the frontage of Whitechapel Road; which will need to be retained. This is not considered as a significant issue and could be addressed as part of a detailed planning application. The indicative masterplan (SS11) has demonstrated that this feature can be successfully incorporated into the design of any future development.

Landscape

- 1.50 The submitted landscape character assessment has concluded there to be no significant issues. However, the site is crossed by the Spen Valley Heritage Trail and is a valued feature of the landscape. The indicative masterplan (SS11) has demonstrated that this feature can be successfully incorporated into the design of any future development. This is not considered as a significant constraint and it could be addressed as part of a detailed planning application.

Air Quality

- 1.51 The submitted air quality and odour appraisal has concluded that the development has the potential to affect existing air quality as a result of road traffic exhaust emissions associated with vehicles travelling to and from the site during the operational phase. Although trip generation information was unavailable to inform the appraisal, it is considered likely that the DMRB and IAQM criteria for detailed assessment will be exceeded. As such, a dispersion modelling assessment of road vehicle exhaust emission impacts should be undertaken in support of any planning application for the site. Based on the results, mitigation may be required to reduce effects to an acceptable level. This is not considered as a significant constraint and it could be addressed as part of a detailed planning application.

Residential Amenity

- 1.52 It is considered that the impact of the development on residential amenity could be addressed through appropriate design, layout and use of buffers as part of a detailed planning application. It is listed as a site specific consideration and as such it is made clear that mitigation is required.

g) What effect would the proposed boundary changes and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?

- 1.53 The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.
- 1.54 This site is required to meet the objectively assessed need for strategic employment locations in the district and as such exceptional circumstances exist to amend the green belt boundary. This is based on market need and locational demand and ensures that employment land is available to meet the aspirations both of the Kirklees Economic Strategy and the Leeds City Region economic market area. After due consideration of all relevant non green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating employment development on the site outweigh the loss of this part of the green belt.

- 1.55 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.
- 1.56 The exceptional circumstances that exist to justify altering the green belt have been provided to the inspector in document EX36 Employment Land Supply Briefing Note. This concludes that the supply of land in the urban area is limited in terms of its ability to deliver on the economic objectives for Kirklees and the Leeds City Region but does play an important role to support SME operations. In view of this consideration has been given to the need to release land from the green belt to ensure sites of sufficient scale in locations which can take advantage of the motorway network have been taken into account.
- 1.57 The conclusion of this exercise identified that exceptional circumstances exist if the Local Plan is to meet the needs of the Kirklees economy in full, as agreed with neighbouring authorities through Duty-to-cooperate discussion (SD14, page 16, 10 paragraph 5.12) and to ensure the delivery of both the Kirklees Economic Strategy and the Leeds City Region Strategic Economic Plan.

h) Is the proposal viable and deliverable? What are the anticipated timescales for delivery? Are there phasing implications arising from impacts on the Strategic Road Network and funding availability?

- 1.58 This proposal is considered to be viable and deliverable. The site promotor has provided market demand evidence and has confirmed that there has already been a significant amount of interest in the site from developers and this site has very similar traits to sites brought forward during 2017.
- 1.59 The lack of supply of units has led to some speculative development in the region, albeit this is still minimal and supply of good quality stock is limited across all size ranges. There is however a growing appetite from developers to speculatively build units supported by successful schemes
- 1.60 This site has been assessed in the Kirklees Employment Market Strength Assessment (LE11), as likely to be attractive to the market. It has potentially significant development constraints, including topographical issues.
- 1.61 Evidence has demonstrated that there is demand for the site, there is a willing landowner and there are no significant constraints. It is anticipated that the site will be fully delivered by the end of the plan period.
- 1.62 The site promotor has indicated that the site could be developed in phases, with the first phase being to the north of the site with access off Whitehall Road. The first phase will generate the funds required to install the necessary infrastructure and build out the remainder of the site.
- 1.63 There are no phasing implications arising from impacts on the Strategic Road Network and funding availability. E1831 is modelled by Highways England as generating a less than significant impact on the Strategic Road Network (including at Junction 26 of the M62/M606 - Chain Bar) at a predominant B2 or B8 mix of Use Classes. Hence development of E1831 is therefore not considered by Highways England to have the potential to generate a significant impact upon the Strategic Road Network (including at Junction 26 of the M62/M606 - Chain Bar) at a

predominant B2 or B8 mix of Use Classes. As a result Highways England agrees that modification AD-MM4 is not necessary to make E1831 sound and should be withdrawn. This is established within the Kirklees Council and Highways England Joint Position Statement (SC008). In accordance with this the Council is proposing that Modification AD-MM4 in SD4 with regard to E1831 is amended to delete "Development may need to contribute to improvements to the strategic road network if committed schemes will not provide sufficient capacity" as shown, but the replacement text is no longer required. This is because development is not dependent upon construction of a committed scheme and will not need to be phased to take place following scheme opening. Furthermore, Highways England considers E1831 to be sound notwithstanding the postponement of the RIS Scheme at Junction 26 of the M62/M606 (Chain Bar).

E1985a – former North Bierley Waste Water Treatment Works, Cliff Hollins Lane, Cleckheaton (46,451 m2)

a) What type of employment uses would be supported on the site? Is the indicative floorspace capacity justified and deliverable?

- 1.64 Refer to answer to Matter 26 l) and m).
- 1.65 In principle, all B use class operations would be supported on this site. Proposals for office use would be subject to the sequential test unless it can be proven to be ancillary to the primary operation.
- 1.66 E1985a is a strategic employment allocation, required to meet the needs of the manufacturing industry; particularly advanced manufacturing and precision engineering (Use Class B2) to assist in the delivery of the Leeds City Regions and Kirklees Council's economic objectives.
- 1.67 As such, the use class ratio (B1a=10%, B1b=10%, B1c=10%, B2=60%, B8=10%) as discussed in Matter 26 m) has been applied to determine the indicative floorspace capacity. This capacity is provided in the site text box (46,451 sq. m) and is based on a net site area taking into account the non-developable areas. 5.9 ha has been removed from the site area to accommodate M62/M606 widening scheme and 0.52 ha has been removed as a buffer to the adjacent Local Wildlife Site.
- 1.68 The site capacity for this allocation is based on the site promoters' specified floorspace of 500,000 sq ft.
- 1.69 The Council considers the indicative site capacity to be appropriate and it has been based on the Yorkshire and Humber 'Translating Jobs into Land' study by Roger Tym & Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.
- 1.70 The Council are currently considering an outline planning application on this site (2016/92298) for the re-development of former waste water treatment works following demolition of existing structures to provide employment uses (use classes B1(c), B2 and B8).
- 1.71 At this stage the application details that the proposal is for 35,284 sq. m of B2 and B8 use with ancillary offices on a 30% B2 and 70% B8 split, including associated hard

standing service yards and car park areas. As this is an outline application the exact size, nature and location of the end users cannot be determined at this stage.

- 1.72 Whilst all matters are reserved, the submitted information includes a parameter plan which demonstrates the maximum floorspace and building heights in accordance with the requirements of the Environmental Impact Assessment (EIA).

b) How does the site fit with local and sub-regional economic strategy?

- 1.73 The Kirklees Economic Strategy (KES) sets the following vision for the district:

“Our vision for Kirklees to be recognised as the best place to do business in the North of England and one where people flourish in all of our communities”.

- 1.74 The KES sets five priorities to deliver this vision all of which can be supported through site allocations of strategic significance to assist the growth of business and industry. These priorities are:

- **Precision engineering and innovative manufacturing:** strength in depth and excellence;
- **Innovation and enterprising businesses:** championing creativity, entrepreneurship and resilience;
- **Workforce, skills and employment:** extending opportunities and powering business success;
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- **Quality places:** locations of choice for people, business and investment.

- 1.75 Paragraph 2.21 of the Employment Technical Paper (SD22) clarifies that the KES targets growth of the engineering and manufacturing sector (Priority One) through a range of measure including the need to provide major new sites and developments and better links to innovation assets and supply chains. The KES (LE6) also recognises the diverse nature of Kirklees and the requirement for a varied approach (page 1, paragraph 6, KES Summary).

- 1.76 Six headline initiatives have been identified as having the potential to drive forward this transformational change. These headline initiatives are large scale investments and will require integrated action across stakeholders to ensure delivery. Two of the key six headline initiatives include the need to ‘consolidate Kirklees as the heart of a growing innovative manufacturing and engineering cluster in the LCR’ and to deliver ‘strategic employment sites to stimulate jobs and growth, with focus on manufacturing and engineering’ (KES Summary (LE6) page 2, The Six Headline Initiatives).

- 1.77 The KES also aligns its priorities with the Leeds City Region Strategic Economic Plan (LCR SEP) (CR9) and in particular intends to be at the forefront and lead with a focus on innovative manufacturing. The LCR SEP (CR9) recognises a number of the key assets for the city region which includes research and development and innovation assets and a manufacturing workforce of around 140,000 placing the city region at the heart of the UK’s advanced manufacturing and engineering industry (page 44).

- 1.78 Page 32 of the LCR SEP (CR9) identifies Kirklees as having strong commuting and business connections with Leeds and relationships with neighbouring authorities such as Calderdale, Bradford and Wakefield in addition to important links to

Manchester and Sheffield. Assets of the Kirklees district which are of city regional importance include world leading engineering and textile businesses, cutting edge innovation and creative businesses. Recognition is also afforded to the fact there are major employment growth opportunities at Cooper Bridge and Chidswell and through the M62 Enterprise Zone sites at Lindley Moor and Mirfield.

- 1.79 LCR SEP Priority 4 (page 75, Infrastructure for Growth) seeks to support the City Region to grow and compete globally through a range of Key Action Areas. Key Action Area (A) (Integrated Spatial Priority Areas) includes key action (Aiii) which focuses on employment growth areas (including mixed use employment site and enterprise zones). The priorities for key action (Aiii) include:
- Accelerate delivery of employment growth areas and supporting infrastructure to facilitate sustainable job growth;
 - Identify and deliver upfront infrastructure to tackle development constraints; and
 - Deliver a comprehensive inward investment and marketing solution for all Leeds City Region Enterprise Zones.
- 1.80 The SEP has a place-based focus which applies an integrated set of Spatial Priority Areas. These are set out on page 77 and identifies Chidswell (22), Cooper Bridge (25) and Lindley Moor East and Lindley Moor West as Employment Growth Areas. These are also listed in the table on page 79. Included within these Employment Growth Areas are the City Regions Enterprise Zones and includes the M62 Corridor Enterprise Zone capturing sites within Kirklees (page 80).
- 1.81 These new Enterprise Zones capitalise on existing concentration of manufacturing businesses within West Yorkshire, maximising the value of the M62 Corridor as a strategic location ideally suited to facilitate access to a wide pool of skilled workers and has the potential to deliver approximately 100 hectares of new employment land for the advanced and innovative manufacturing sector (page 81).
- 1.82 Site E1985a provides a unique opportunity to secure development of a brownfield site that is of sufficient scale to be attractive to the manufacturing and engineering sector, whilst also being well placed to take advantage of access to the M62. The location of site E1985a is entirely consistent with the KES and LCR SEP objectives and provides the opportunity to help consolidate the Kirklees district at the heart of a growing innovative manufacturing and engineering cluster in the city region.
- 1.83 Due to the sites close proximity along the M62 corridor it provides good access to wide pool of skilled workers and will make a positive contribution to the need for new employment land to support the growth aspirations of the advanced and innovative manufacturing sector (CR9, page 81).

c) How was the site selected and its boundaries determined?

- 1.84 Site E1985a was put forward as an employment site option by the site promoter through the Council's call for sites exercise. This process is set out in the Local Plan Methodology Statement Part 2 (BP23, page 5, paragraph 3.1, bullet 1).
- 1.85 The site was then considered in line with the methodology set out for development site options in document BP23 at paragraphs 4.15 - 4.63, pages 9 to 21.
- 1.86 Supply within the urban area was identified in the first instance and a critique of this supply was undertaken to understand its role and function. This approach has been

set out in the Employment Technical Paper (SD22) at paragraphs 6.19 to 6.27, pages 34 to 38. The conclusions of this exercise determined there to be insufficient land supply within the urban area to meet the OAN derived land requirement and also concluded, from a qualitative perspective that supply within the urban area was not of a sufficient scale or well-located to meet the growth objectives of the manufacturing and engineering sector. This supply also fails to support the economic objectives of the both the KES and the SEP.

- 1.87 Consideration was afforded to the objectives of both the KES and the LCR SEP and priority given to those sites that met the criteria set out within these economic strategies, see response to Matter 27, question b) for a summary of these criteria. It was concluded that site E1985a performed strongly against these requirements.
- 1.88 Sites that performed well against the objectives of both the KES and the LCR SEP which did not have any absolute constraints identified through the technical site assessment, and where no better alternatives were identified were put forward as draft allocations.
- 1.89 The boundary has been determined by taking account of the need to bring forward a quantum of land that can assist in meeting the employment land requirement and the objectives set out in the KES and the LCR SEP. The site boundary has been established by following physical features on the ground to ensure the new green belt boundary can endure beyond the Local Plan period as required by NPPF, paragraph 85.

d) Where relevant, has the impact of the proposal on heritage assets been adequately assessed and addressed?

- 1.90 Historic England and WYAAS have been consulted and there is no significant heritage or archaeological issues in relation to this site.

e) Does the Plan provide sufficient detail regarding the location and extent of any non-developable areas or buffer zones required to protect residential amenity/biodiversity/historic assets/highways works?

- 1.91 The Council considers that the plan provides sufficient detail regarding the location and extent of any non-developable areas or buffer zones. An indicative capacity is provided of 46,451 sq m and this capacity is based on a net site area taking into account a number of non-developable areas, including the M62/M606 widening scheme, HSE Inner Zone and Local Wildlife Site buffer.
- 1.92 The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in the Yorkshire and Humber 'Translating Jobs into Land' study by Roger Tym & Partners, April 2010 (CR25) at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that the indicative site capacity is appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.
- 1.93 Policy PLP5 of the Local Plan requires that masterplans be submitted prior to the submission of a planning application. This is an appropriate mechanism to define the location and extent of any non-developable areas or buffer zones.

Residential Amenity

- 1.94 The site text box states that residential amenity will need safeguarding through sensitive siting of buildings and landscape buffer areas. The council consider that this could be achieved at planning application stage or through a masterplan.

Biodiversity

- 1.95 This site is located adjacent to Hanging Wood Local Wildlife Site (LWS), which is ancient woodland. A minimum buffer of 20m should be provided around the LWS and 0.52 ha has been removed from the developable area. The location of the LWS is shown on the policies map (SD3).

Historic Assets

- 1.96 No significant issues in relation to historic assets have been identified that would reduce the developable area.

Highway works

- 1.97 The Publication Draft Local Plan contains a specific policy on masterplanning which sets out the requirements of a masterplan. Agreed masterplans will be used as the basis by which planning applications submitted on that site will be determined.
- 1.98 Policy PLP 5, Masterplanning Sites states: "Masterplans must involve all relevant stakeholders, including the council, landowners, developers, the local community, service providers and other interested parties. Masterplans will be developed in consultation with the council prior to the submission of a planning application."
- 1.99 In broad terms, masterplans provide design guidance for areas that are likely to undergo some form of change. They will describe and map the overall vision and concept for the proposed development including proposed land uses, urban design, landscaping, built form, movement and access and infrastructure and service provision providing a clear and cohesive framework for development. They will also set out the intended implementation and phasing of development.
- 1.100 Local and Strategic highway schemes to support the delivery of the Local Plan are emerging and developing in conjunction with the progression of the Local Plan. In some cases the final design is not yet finalised. The Council considers that the masterplanning policy allows for detail on **any** highway schemes and therefore associated non-developable areas and/or buffer zones to be provided at the time of application.
- 1.101 The Council considers that Policy TS9 in the plan provides enough information to alert potential developers that a site might be subject to certain constraints as a result of proximity to a strategic transport scheme. The following provides further detail around the strategic scheme in TS9 and what information has been provided in the orange site allocation boxes in the Allocations and Designations Document (SD2).
- 1.102 The orange site allocation box for this site states: "developable area reduced to take account of a Department for Transport highways improvement scheme (M606 and M62), an area affected by a hazardous installation inner zone and a buffer for the Local Wildlife Site."

1.103 5.9 Ha has been removed from the developable area to reflect the Department of Transport highway scheme - M62/M606 widening.

1.104 The Council considers this is the provision of sufficient information because as with all major schemes as the design progresses, the final alignment or funding can change and therefore it is considered pertinent to signpost developers with the text and to provide detailed information at planning application stage.

HSE Inner Zone

1.105 HSE inner zone affects 0.24 Ha of the site. This is within the area already netted off for the highway widening scheme.

f) Are other constraints such as highways, flood risk, landscaping, drainage and power lines suitably mitigated through Part 2 of the Plan?

1.106 The Council considers that the plan provides clear guidance on the requirements and constraints. Pages 11 and 12 of the Allocations and Designations document (SD2) lists the constraints and the reports that may be required to accompany the submission of a planning application. Other site specific considerations are also listed along with mitigation measures.

1.107 Highways, drainage, flood risk, contamination, noise, odour, LWS and powerlines are all listed as constraints, none of which are considered to be significant. The reports that would be required to address these constraints are also listed along with mitigation measures relating to biodiversity, residential amenity and the strategic road network. Site constraints identified in Part 2 of the Local Plan are discussed below:

Highways

1.108 Policies TS1 to TS5 and TS8 to TS11 show in strategic terms what transport infrastructure is required to ensure that the district can accommodate the cumulative impact of the development traffic from the Plan's site allocations. From the perspective of viability it cannot be expected that individual sites could fund the level of infrastructure provided, so policy PLP4 in the Strategy and Policies Document (SD1) exists to ensure that at application stage, due regard is taken of the infrastructure required under the TS designations and that developments should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL).

1.109 With respect of local highway constraints, the Council considers that that level of detail will be dealt with and discussed at pre-planning application, where at that point in time a better understanding will be had of what committed developments are in the local area, what the progress is of the larger strategic schemes and at what point they might be implemented.

1.110 With regard to the Strategic Road Network and specifically Site E1985a, the Council and Highways England agree that there are no Strategic Road Network constraints that require mitigation through Part 2 of the Plan. This is established by virtue of both parties agreeing Modification AD-MM5 within the Statement of Common Ground between Kirklees Council and Highways England (SC006 and revised in the appendix of SC008). The site allocation box for E1985a in Part 2 of the Plan requires a Transport Assessment to be carried out at application stage. The Council will

expect this to assess whether there are any strategic road network constraints at the time of application and to identify how these constraints (if present) could be suitably mitigated through a Travel Plan or other measures. Policy PLP 4 enables the Council to seek contributions towards additional mitigation measures from applications upon allocations that do not in themselves generate a significant impact upon the Strategic Road Network (i.e. E1985a) if a Transport Assessment deems it necessary. These contributions would be sought in accordance with Paragraphs 204 and 173 of the NPPF.

Flood risk and drainage

- 1.111 This is not considered as significant and could be addressed as part of a detailed planning application. The site falls within Flood Zones 1, 2 and 3a as defined by the EA Flood maps. A Flood Risk Assessment would be required for development in Flood Zones 2 and 3a.
- 1.112 The Flood Risk Assessment and Drainage Strategy provided within the Environmental Statement accompanying the planning application, provides an assessment of the likely significant effects of the proposed development on flood risk and drainage. It is concluded that the proposals will not increase flood risk, either to the site itself or to others within the local catchment area.

Environmental Health (contamination, noise, odour and air quality)

- 1.113 These are not considered as significant and could be addressed as part of a detailed planning application.
- 1.114 An Environmental Statement (ES) has been prepared and submitted as part of the Site Specific evidence (SS7). It considers the likely significant environmental effects of the scheme and the proposed ways to prevent, reduce and offset any significant adverse effects on the environment (mitigation measures).
- 1.115 In terms of air quality the ES concludes that, with mitigation measures to reduce emissions, the impact of the proposed development on air quality will be low.
- 1.116 In terms of contamination mitigation measures have been outlined in order to reduce the significance of these impacts. In all instances, the significance of the impact can be reduced to negligible once mitigation measures are implemented.

Biodiversity

- 1.117 The site is adjacent to Hanging Wood Local Wildlife Site, which is an ancient wood site. This is not considered as a significant issue and could be addressed as part of a detailed planning application. The indicative masterplan (SS7) has demonstrated that protection of this feature can be successfully incorporated into the design of any future development.
- 1.118 The submitted planning application has demonstrated that this site is capable of being developed with appropriate measures in place to mitigate against any constraints.

g) What effect would the proposed boundary changes and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?

- 1.119 The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.
- 1.120 This site is required to meet the objectively assessed need for strategic employment locations in the district and as such exceptional circumstances exist to amend the green belt boundary. This is based on market need and locational demand and ensures that employment land is available to meet the aspirations both of the Kirklees Economic Strategy and the Leeds City Region economic market area. After due consideration of all relevant non green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating employment development on the site outweigh the loss of this part of the green belt.
- 1.121 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.
- 1.122 The exceptional circumstances that exist to justify altering the green belt have been provided to the inspector in document EX36 Employment Land Supply Briefing Note. This concludes that the supply of land in the urban area is limited in terms of its ability to deliver on the economic objectives for Kirklees and the Leeds City Region but does play an important role to support SME operations. In view of this consideration has been given to the need to release land from the green belt to ensure sites of sufficient scale in locations which can take advantage of the motorway network have been taken into account.
- 1.123 The conclusion of this exercise identified that exceptional circumstances exist if the Local Plan is to meet the needs of the Kirklees economy in full, as agreed with neighbouring authorities through Duty-to-cooperate discussion (SD14, page 16, 10 paragraph 5.12) and to ensure the delivery of both the Kirklees Economic Strategy and the Leeds City Region Strategic Economic Plan.

h) Is the proposal viable and deliverable? What are the anticipated timescales for delivery? Are there phasing implications arising from impacts on the Strategic Road Network and funding availability?

- 1.124 This proposal is considered to be viable and deliverable and this is demonstrated by the outline planning permission that the council are currently considering on this site (2016/92298) for the re-development of former waste water treatment works following demolition of existing structures to provide employment uses (use classes B1(c), B2 and B8).
- 1.125 Given that there is a willing landowner, demand and a current planning application, the council are confident this site will be fully delivered within the plan period.
- 1.126 There are no phasing implications arising from impacts on the Strategic Road Network and funding availability. This is due to the fact that E1985a is modelled by Highways England as generating a less than significant impact on the Strategic Road

Network (including at Junction 26 of the M62/M606 - Chain Bar). Hence development of E1985a is not considered by Highways England to have the potential to generate a significant impact upon the Strategic Road Network (including at Junction 26 of the M62/M606 - Chain Bar). This is established by virtue of both parties agreeing the Statement of Common Ground between Kirklees Council and Highways England (SC006 and revised in the appendix of SC008) that deletes the 'other site specific consideration' for E1985a relating to the Strategic Road Network (AD-MM5). Highways England agree that Modification AD-MM5 in SD4 is necessary to make E1985a sound because development is not dependent upon construction of a committed scheme and will not need to be phased to take place following scheme opening. Furthermore, Highways England considers E1985a to be sound notwithstanding the postponement of the RIS Scheme at Junction 26 of the M62/M606 (Chain Bar).

E1832c – land north and west of the Three Nuns Pub and the former Cooper Bridge Waste Water Treatment Works, Leeds Road, Mirfield (162,187 m2)

a) What type of employment uses would be supported on the site? Is the indicative floorspace capacity justified and deliverable?

- 1.127 Refer to answer to Matter 26 l) and m).
- 1.128 In principle all B use class operations would be supported on this site. Proposals for office use would be subject to the sequential test unless it can be proven to be ancillary to primary operation.
- 1.129 However, this is a strategic employment allocation, intended to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering (Use Class B2) to assist in the delivery of the Leeds City Regions and Kirklees Council's economic objectives.
- 1.130 Due to this the use class ratio (B1a=10%, B1b=10%, B1c=10%, B2=60%, B8=10%) as discussed in Matter 26 m) has been applied to determine the indicative floorspace capacity. This capacity is provided in the site text box (162, 187 sq m); it is based on a net site area taking into account non-developable areas, 4.23 Ha of the site falls within Flood Zone 3ai and 6.73 Ha falls within a UK BAP habitat and Wildlife Habitat Network.
- 1.131 The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber 'Translating Jobs into Land' study by Roger Tym & Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.

b) How does the site fit with local and sub-regional economic strategy?

- 1.132 The Kirklees Economic Strategy (KES) sets the following vision for the district:
- 1.133 *"Our vision for Kirklees to be recognised as the best place to do business in the North of England and one where people flourish in all of our communities".*
- 1.134 The KES sets five priorities to deliver this vision all of which can be supported through site allocations of strategic significance to assist the growth of business and industry, these priorities are:

- **Precision engineering and innovative manufacturing:** strength in depth and excellence;
- **Innovation and enterprising businesses:** championing creativity, entrepreneurship and resilience;
- **Workforce, skills and employment:** extending opportunities and powering business success;
- **Infrastructure:** making it easier for businesses to succeed and for people to access work; and
- **Quality places:** locations of choice for people, business and investment.

1.135 Paragraph 2.21 of the Employment Technical Paper (SD22) clarifies that the KES targets growth of the engineering and manufacturing sector (Priority One) through a range of measure including the need to provide major new sites and developments, better links to innovation assets and supply chains. The KES (LE6) also recognises the diverse nature of Kirklees and the requirement for a varied approach; therefore the degree of change needed will range and the response to some areas will be evolutionary (page 1, paragraph 6, KES Summary).

1.136 Six headline initiatives have been identified as having the potential to drive forward this transformational change. These headline initiatives are large scale investments and will require integrated action across stakeholders to ensure delivery. Two of the key six headline initiatives include the need to 'consolidate Kirklees as the heart of a growing innovative manufacturing and engineering cluster in the LCR' and to deliver 'strategic employment sites to stimulate jobs and growth, with focus on manufacturing and engineering' (KES Summary (LE6) page 2, The Six Headline Initiatives).

1.137 The KES also aligns its priorities with the Leeds City Regions Strategic Economic Plan (LCR SEP) (CR9) and in particular intends to be at the forefront and lead with a focus on innovative manufacturing. The LCR SEP (CR9) recognises a number of the key assets for the city region which includes research and development and innovation assets and a manufacturing workforce of around 140,000 placing the city region at the heart of the UK's advanced manufacturing and engineering industry (page 44).

1.138 Page 32 of the LCR SEP (CR9) identifies Kirklees as having strong commuting and business connections with Leeds and relationships with neighbouring authorities such as Calderdale, Bradford and Wakefield in addition to important links to Manchester and Sheffield. Assets of the Kirklees district which are of city regional importance include world leading engineering and textile businesses, cutting edge innovation and creative businesses. Recognition is also afforded to the fact there are major employment growth opportunities at Cooper Bridge, Chidswell and through the M62 Enterprise Zone sites at Lindley Moor and Mirfield.

1.139 LCR SEP Priority 4 (page 75, Infrastructure for Growth) seeks to support the City Region to grow and compete globally through a range of Key Action Areas. Key Action Area (A) (Integrated Spatial Priority Areas) includes key action (Aiii) which focuses on employment growth areas (including mixed use employment site and enterprise zones). The priorities for key action (Aiii) include:

- Accelerate delivery of employment growth areas and supporting infrastructure to facilitate sustainable job growth
- Identify and deliver upfront infrastructure to tackle development constraints

- Deliver a comprehensive inward investment and marketing solution for all Leeds City Region Enterprise Zones
- 1.140 The SEP has a place-based focus which applies an integrated set of Spatial Priority Areas. These are set out on page 77 and identify Chidswell (22), Cooper Bridge (25) and Lindley Moor East and Lindley Moor West as Employment Growth Areas. These are also listed in the table on page 79. Included within these Employment Growth Areas are the City Regions Enterprise Zones and includes the M62 Corridor Enterprise Zone capturing sites within Kirklees (page 80).
- 1.141 These new Enterprise Zones capitalise on existing concentration of manufacturing businesses within West Yorkshire, maximising the value of the M62 Corridor as a strategic location ideally suited to facilitate access to a wide pool of skilled workers and has the potential to deliver approximately 100 hectares of new employment land for the advanced and innovative manufacturing sector (page 81).
- 1.142 Site E1832c will play a significant role in supporting the growth objectives of both the KES and LCR SEP. In particular site E1832c is well placed to take advantage of access to the M62 is accessible to a skilled workforce and is of a scale which will support the growth aspirations of precision engineering and advanced manufacturing. Sites of this nature have been identified as being critical to the delivery of the objectives of both the KES and LCR SEP where it is stated by both economic strategies that strategic employment sites will play a key role in supporting the growth aspiration for this sector (KES Summary (LE6) page 2, The Six Headline Initiatives) and (LCR SEP (CR9) Priority 4, page 75, key action (Aiii)).
- 1.143 The LCR SEP also makes specific reference to the growth opportunity that the Cooper Bridge site presents to the manufacturing sector of the wider city region on pages 32 and 77. The site allocation is therefore fully compliant with the objectives of both the KES and LCR SEP.

c) How was the site selected and its boundaries determined?

- 1.144 Site E1832c was put forward as an employment site option by the site promoter through the Council's call for sites exercise. This process is set out in the Local Plan Methodology Statement Part2 (BP23, page 5, paragraph 3.1, bullet 1).
- 1.145 The Council considered all site options put forward, either through the call for sites exercise, a review of existing UDP allocations or the Council's own asset review. These were assessed in line with the methodology set out for development site options in document BP23 at paragraphs 4.15 - 4.63, pages 9 – 21.
- 1.146 Supply within the urban area was identified in the first instance and a critique of this supply was undertaken to understand its role and function. This approach has been set out in the Employment Technical Paper (SD22) at paragraphs 6.19 – 6.27, pages 34 – 38. The conclusions of this exercise determined there to be insufficient land supply within the urban area to meet the OAN derived land requirement and also concluded, from a qualitative perspective that supply within the urban area was not of a sufficient scale or well-located to meet the growth objectives of the manufacturing and engineering sector. This supply also fails to support the economic objectives of the both the KES and the SEP.
- 1.147 Consideration was afforded to the objectives of both the KES and the LCR SEP, therefore priority would be given to those sites that met the criteria set out within these economic strategies – see response to Matter 27, question b) for a summary of

these criteria. It was concluded that site E1832c performed strongly against these requirements.

- 1.148 Sites that performed well against the objectives of both the KES and the LCR SEP which did not have any absolute constraints identified through the technical site assessment, and where no better alternatives were identified were put forward as draft allocations.
- 1.149 The initial boundary of the site was put forward by the site promoter and was included in the Draft Local Plan as site E1832. However, the scheme has evolved, principally in response to heritage concerns, to relocate and reduce the amount of land to be released from the green belt. The original scheme had boundaries in its northern area that followed contour lines, an approach which was adopted to ensure that the development sat well in the landscape. This, however, has changed to allow the site boundaries to follow more permanent and easily recognisable features on the ground.
- 1.150 This is considered to accord with the guidance on green belt boundaries in Paragraph 85 of NPPF. The boundaries now follow a combination of roads, woodland blocks and well established existing field boundaries. Following consultation the Council subsequently reviewed the boundary and established that a better performing boundary could be achieved that would ensure a reduced impact upon the 5 purposes of including land in the green belt and one that also followed physical features on the ground making the boundary more defensible and therefore ensuring its permanence beyond the plan period.

d) Where relevant, has the impact of the proposal on heritage assets been adequately assessed and addressed?

- 1.151 The proposed development site lies to the immediate east and south of Kirklees Park, an 18th century designed landscape which provides the physical, aesthetic and historic setting for an important group of Grade I, II* and II Listed Buildings, and two Scheduled Monuments. Kirklees Park is now included on the Register of Historic Parks and Gardens (PRN12067).
- 1.152 Roman pottery has been recovered from the site (PRN2123). WYAAS have concerns over potential impact on setting of this Registered Park and a pre-determination archaeological evaluation would be required.
- 1.153 A Heritage Impact Assessment has been carried out by FAS in 2012 and updated in 2017 and form part of the Local Plan examination library under section 7, SS4. The Heritage Assessment Report is a comprehensive assessment of the likely effects that the proposed allocation might have upon a number of heritage assets within the area. This report has been shared with Historic England who has concurred with much of what the report concluded regarding the potential impact which the eventual development of this area might have upon the majority of these assets.
- 1.154 A Heritage Overview Report has also been prepared to amalgamate the comprehensive heritage, landscape and visual assessment work that has been undertaken to support the allocation of E1832c. Again, this forms part of the Local Plan examination library under section 7, SS4. Included within this is an updated Heritage Assessment Report (dated January 2018). This has been revised in response to the concerns raised by Historic England with their Matter 21 statement; i.e. that the October 2017 Heritage Assessment Report did not provide sufficient

evidence to demonstrate that the proposed development would not harm the setting of the following heritage assets:

- Kirklees Hall (Grade I Listed)
- Replica Roman watchtower (should it be restored) (Grade II Listed)
- Yew Tree and barn (Grade II Listed)
- Mock Hall (Grade II Listed)
- Kirklees Park (Registered Park and Garden)

1.155 In order to address these concerns the January 2018 Heritage Assessment Report includes further visualisations composed from the following locations:

- Viewpoint 14 – Private land to the rear of Mock Hall
- Viewpoint 15 – A644 Leeds road, entrance to service depot
- Viewpoint 16 - Land south of the Kirklees Park, looking east
- Viewpoint 17 - Top of the Roman watchtower
- Viewpoint 18 – Kirklees Hall, first floor

1.156 The results from this report concluded that for the vast majority of views in and around the development, there is an opportunity to visually screen the development in a way which does not erode the ability to understand and interpret the setting of the heritage assets in the area.

1.157 Of those where the development would have a lasting effect, these are minor in nature and enough character is retained in the area to allow the importance of the heritage assets to be understood. In view of this development can retain a strong sense of rural setting in the most sensitive areas of parkland, i.e. those to the north, around Home Farm and Kirklees Hall. A form of development can therefore be proposed on E1832c that minimises harm to the significance of heritage assets, and which does not materially detract from it.

1.158 The council has concluded that the allocation would lead to less than substantial harm to the significance of the designated heritage assets and that this harm is outweighed by the public benefits of the proposal, including securing their optimum viable use. The council's case for this is set out in the attached 'exceptional circumstances / public benefits statement' (see Appendix 1).

e) Does the Plan provide sufficient detail regarding the location and extent of any non-developable areas or buffer zones required to protect residential amenity/biodiversity/historic assets/highways works?

1.159 The plan provides sufficient detail regarding the location and extent of any non-developable areas or buffer zones, an indicative capacity is provided (162,187 sq m); this capacity is based on a net site area taking into account non-developable areas, Flood Zone 3ai) and UK BAP Priority Habitat.

1.160 The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.

Residential Amenity

- 1.161 No significant issues have been identified in relation to residential amenity. The majority of the site is set away from residential areas, although it should be noted that one residential property does sit in close proximity to the land south of the A644. Sensitive landscaping, design and layout can be achieved to ensure the amenity of the nearby properties can be safeguarded.

Biodiversity

- 1.162 WYE have confirmed that the area of Common Spotted Orchids should be retained if it can be mapped. The River Calder and Nun Brook converge at part of this proposed allocation and both are UK BAP priority habitats. There are areas of recently planted woodland which link areas of woodland to east and west of the site and woodland along the Nun Brook all of which should be retained. There is also Otter on the River Calder, and therefore there is a need to retain minimum of 10 m stand off and plant with locally native woodland or scrub. In view of this the developable area has been reduced by 6.73 ha due to UK BAP habitat and wildlife habitat networks.

Historic Assets

- 1.163 Existing landscape constraints and a landscape sensitivity plans have been produced (SS4) and used to inform the scale and layout of the indicative masterplan for the site. The conclusions of the heritage impact assessments has also been influential in informing layout and design to ensure appropriate mitigation can be accommodated. These considerations are set out in both Appendix 1 and 2 of the Cooper Bridge Heritage Overview Report (SS4).
- 1.164 See response to Matter 27, question d) for further detail in relation to historic assets.

Highways works

- 1.165 The Publication Draft Local Plan contains a specific policy on masterplanning which sets out the requirements of a masterplan. Agreed masterplans will be used as the basis by which planning applications submitted on that site will be determined.
- 1.166 Policy PLP 5, Masterplanning Sites states: "Masterplans must involve the all relevant stakeholders, including the council, landowners, developers, the local community, service providers and other interested parties.
- 1.167 Masterplans will be developed in consultation with the council prior to the submission of a planning application. "
- 1.168 In broad terms, masterplans provide design guidance for areas that are likely to undergo some form of change. They will describe and map the overall vision and concept for the proposed development including proposed land uses, urban design, landscaping, built form, movement and access and infrastructure and service provision providing a clear and cohesive framework for development. They will also set out the intended implementation and phasing of development.
- 1.169 Local and Strategic highway schemes to support the delivery of the Local Plan are emerging and developing in conjunction with the progression of the Local Plan. In some cases the final design is not yet finalised. The Council considers that the Masterpalnning policy allows for detail on **any** highway schemes and therefore associated non-developable areas and/or buffer zones to be provided at the time of application.

- 1.170 The Council considers that Policy TS9 in the plan provides enough information to alert potential developers that a site might be subject to certain constraints as a result of proximity to a strategic transport scheme. The following provides further detail around the strategic scheme in TS9 and what inflation has been provided in the orange site allocation boxes in the Allocations and Designations Document.
- 1.171 In line with Policy PLP5 a Masterplan and Joint Delivery Statement has been prepared for this site, where part of the draft strategic highway scheme has been included¹. The masterplan shows an indicative scheme of around 158,000sqm across 4 phases. The Council considers the work produced to date links with Policy PLP5 and so there is no requirement to detail this in the Allocations and Designations Document.

Flood Risk

- 1.172 An area of land adjacent to the Nun Brook and the River Calder fall within flood zone 3ai therefore 4.23 ha of land has been removed from the developable area.

f) Are other constraints such as highways, flood risk, landscaping, drainage and power lines suitably mitigated through Part 2 of the Plan?

- 1.173 Yes. The plan provides clear guidance on the requirements and constraints, pages 13, 14 and 15 of the Allocations and Designations document (SD2) lists the constraints and the reports that maybe required to accompany the submission of a planning application. Other site specific considerations are also listed along with mitigation measures.
- 1.174 Highways, drainage, flood risk, contamination, noise, air quality, archaeology, biodiversity, protected trees and heritage assets are all listed as constraints. The reports that would be required to address these constraints are also listed along with mitigation measures relating to landscape, biodiversity and residential amenity. The site promoter has provided evidence to the council regarding drainage, flood risk, contamination and landscaping as set out in summary in the Joint Delivery Statement (April 2017) (SS4). The council's approach to pylons is set out in the council's response to Matter 26. The Kirklees Council Air Quality Assessment document (LE118) provides a technical assessment of the impact of the growth proposed in the local plan upon air quality and carbon emissions. The assessment concludes that the overall effect of the Local Plan on local air quality is considered to be not significant (LE118, chapter 6, page 21).
- 1.175 TS1, TS2, TS3, TS4, TS5, TS8, TS9, TS10 and TS11 show in strategic terms what transport infrastructure is required to ensure that the district can accommodate the cumulative impact of the development traffic from the Plan's site allocations. From the perspective of viability it cannot be expected that individual sites could fund the level of infrastructure provided, so policy PLP4 in the Strategy and Policies Document exists to ensure that at application stage, due regard is taken of the infrastructure required under the TS designations and that developments should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through

¹ http://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/site-specific/Cooper_Bridge_Master_Plan.pdf AND http://www.kirklees.gov.uk/beta/planning-policy/pdf/examination/site-specific/Cooper_Bridge_Delivery_Statement.pdf

planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL).

- 1.176 With respect to local highway constraints, the Council considers that that level of detail will be dealt with and discussed at pre- planning application, where at that point in time a better understanding will be had of what committed developments are in the local area, what the progress is of the larger strategic schemes and at what point they might be implemented.

g) What effect would the proposed boundary changes and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?

- 1.177 The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.

- 1.178 This site is required to meet the objectively assessed need for strategic employment locations in the district and as such exceptional circumstances exist to amend the green belt boundary. This is based on market need and locational demand and ensures that employment land is available to meet the aspirations both of the Kirklees Economic Strategy and the Leeds City Region economic market area. After due consideration of all relevant non green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating employment development on the site outweigh the loss of this part of the green belt.

- 1.179 The quantum of land proposed and the sites location meet the requirements of industry that cannot be currently accommodated within the district. Given the importance of such a site to 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. This location is also recognised as a regionally important employment location in the Leeds City Region Strategic Economic Plan.

- 1.180 It is the Council's view that access can be achieved to E1832c without the need to amend or delete green belt in Calderdale. Both Councils have agreed in principle that the creation of an access road between Site E1832c and the A644 would fall under the definition of an 'engineering operation' and would be able to preserve the openness of the Green Belt and not conflict with the purposes of including land within it. More specifically, the Council considers that the formation or laying out of a means of access within Calderdale District to the A644 from E1832c would be a form of development that is not inappropriate in Green Belt provided it preserved the openness of the Green Belt and did not conflict with the purposes of including land within it (in accordance with paragraph 90 of the NPPF and Section 336 of the Town and Country Planning Act 1990).

- 1.181 The exceptional circumstances that exist to justify altering the green belt have been provided to the inspector in document EX36 Employment Land Supply Briefing Note. This concludes that the supply of land in the urban area is limited in terms of its ability to deliver on the economic objectives for Kirklees and the Leeds City Region but does play an important role to support SME operations. In view of this consideration has been given to the need to release land from the green belt to ensure sites of sufficient scale in locations which can take advantage of the motorway network have been taken into account.

- 1.182 The conclusion of this exercise identified that exceptional circumstances exist if the Local Plan is to meet the needs of the Kirklees economy in full – as agreed with neighbouring authorities through Duty-to-cooperate discussion (SD14, page 16, 10 paragraph 5.12) and to ensure the delivery of both the Kirklees Economic Strategy and the Leeds City Region Strategic Economic Plan.
- 1.183 The attached exceptional circumstances / public benefits statement confirms the site specific exceptional circumstances for this allocation.

h) Is the proposal viable and deliverable? What are the anticipated timescales for delivery? Are there phasing implications arising from impacts on the Strategic Road Network and funding availability?

- 1.184 This proposal is considered to be viable and deliverable. The site promotor has provided market demand evidence and has confirmed that there has already been a significant amount of interest in the site from developers. The lack of supply of units has led to some speculative development in the region, albeit this is still minimal and supply of good quality stock is limited across all size ranges. There is however a growing appetite from developers to speculatively build units supported by successful schemes
- 1.185 This site has been assessed in the Kirklees Employment Market Strength Assessment (LE11), as likely to be attractive to the market. It has potentially significant development constraints, including topographical issues.
- 1.186 Evidence has demonstrated that there is demand for the site, there is a willing landowner and there are no significant constraints. It is anticipated that the site will be fully delivered by the end of the plan period.
- 1.187 It will be determined at application stage whether there are any phasing implications arising from impacts on the Strategic Road Network and funding availability. Modification AD-MM7 enables development of E1832c to be phased if a Transport Assessment identifies that this is necessary due to impacts on the Strategic Road Network and funding availability.
- 1.188 With regard to the Strategic Road Network and specifically Site E1832c, the council and Highways England agree that there are Strategic Road Network constraints that require mitigation through Part 2 of the Plan. This is established by virtue of both parties agreeing Modification AD-MM7 within SD4 and the Statement of Common Ground between Kirklees Council and Highways England (SC006 and revised in the appendix of SC008). A Transport Assessment is to be carried out at application stage. The council will expect this to assess whether there are any strategic road network constraints at the time of application and to identify how these constraints (if present) could be suitably mitigated through a Travel Plan or other measures. With AD-MM7 the site allocation box for E1832c in Part 2 of the Plan enables the Council to require the following if a Transport Assessment demonstrates that committed schemes will not provide sufficient capacity to deal with the additional demand generated by E1832c:
- a. Measures that reduce and mitigate significant impacts on the M62.
 - b. Phased development of E1832c.
 - c. Contributions to additional schemes identified by Highways England.

1.189 Any contributions would be sought in accordance with Paragraphs 204 and 173 of the NPPF. The council considers that AD-MM7 will ensure that Strategic Road Network constraints are suitably mitigated.

E2333a – land east of Park Mill, Wakefield Road, Clayton West (59,044 m2)

a) What type of employment uses would be supported on the site? Is the indicative floorspace capacity justified and deliverable?

1.190 Refer to answer to Matter 26 l) and m).

1.191 In principle all B use class operations would be supported on this site. Proposals for office use would be subject to the sequential test unless it can be proven to be ancillary to primary operation.

1.192 However, this is a strategic employment allocation, intended to meet the needs of the manufacturing industry - particularly advanced manufacturing and precision engineering (Use Class B2) to assist in the delivery of the Leeds City Regions and Kirklees Council's economic objectives.

1.193 Due to this the use class ratio (B1a=10%, B1b=10%, B1c=10%, B2=60%, B8=10%) as discussed in Matter 26 m) has been applied to determine the indicative floorspace capacity. This capacity is provided in the site text box as 59,044 sq m and is based on a net site area taking into account non-developable areas. 0.08 Ha falls within Flood Zone 3b. The River Dearne is a UK BAP Priority Habitat and as such 1.9 ha has been removed to provide a 10m stand-off.

1.194 The Council considers the indicative site capacity to be appropriate and has been based on the Yorkshire and Humber 'Translating Jobs into Land' study by Roger Tym & Partners, April 2010 (CR25). The recommended plot ratios of this study have been applied to all of the employment and mixed use allocations (where employment forms part of that mix) and are set out in the Employment Technical Paper (SD22) at paragraphs 5.1 to 5.3.

b) How does the site fit with local and sub-regional economic strategy?

1.195 The Kirklees Economic Strategy (KES) sets the following vision for the district:

"Our vision for Kirklees to be recognised as the best place to do business in the North of England and one where people flourish in all of our communities".

1.196 The KES sets five priorities to deliver this vision all of which can be supported through site allocations of strategic significance to assist the growth of business and industry, these priorities are:

- **Precision engineering and innovative manufacturing:** strength in depth and excellence;
- **Innovation and enterprising businesses:** championing creativity, entrepreneurship and resilience;
- **Workforce, skills and employment:** extending opportunities and powering business success;

- **Infrastructure:** making it easier for businesses to succeed and for people to access work; and
 - **Quality places:** locations of choice for people, business and investment.
- 1.197 Paragraph 2.21 of the Employment Technical Paper (SD22) clarifies that the KES targets growth of the engineering and manufacturing sector (Priority One) through a range of measure including the need to provide major new sites and developments, better links to innovation assets and supply chains. The KES (LE6) also recognises the diverse nature of Kirklees and the requirement for a varied approach; therefore the degree of change needed will range and the response to some areas will be evolutionary (page 1, paragraph 6, KES Summary).
- 1.198 Six headline initiatives have been identified as having the potential to drive forward this transformational change. These headline initiatives are large scale investments and will require integrated action across stakeholders to ensure delivery. Two of the key six headline initiatives include the need to 'consolidate Kirklees as the heart of a growing innovative manufacturing and engineering cluster in the LCR' and to deliver 'strategic employment sites to stimulate jobs and growth, with focus on manufacturing and engineering' (KES Summary (LE6) page 2, The Six Headline Initiatives).
- 1.199 The KES also aligns its priorities with the Leeds City Regions Strategic Economic Plan (LCR SEP) (CR9) and in particular intends to be at the forefront and lead with a focus on innovative manufacturing. The LCR SEP (CR9) recognises a number of the key assets for the city region which includes research and development and innovation assets and a manufacturing workforce of around 140,000 placing the city region at the heart of the UK's advanced manufacturing and engineering industry (page 44).
- 1.200 Page 32 of the LCR SEP (CR9) identifies Kirklees as having strong commuting and business connections with Leeds and relationships with neighbouring authorities such as Calderdale, Bradford and Wakefield in addition to important links to Manchester and Sheffield. Assets of the Kirklees district which are of city regional importance include world leading engineering and textile businesses, cutting edge innovation and creative businesses. Recognition is also afforded to the fact there are major employment growth opportunities at Cooper Bridge, Chidswell and through the M62 Enterprise Zone sites at Lindley Moor and Mirfield.
- 1.201 LCR SEP Priority 4 (page 75, Infrastructure for Growth) seeks to support the City Region to grow and compete globally through a range of Key Action Areas. Key Action Area (A) (Integrated Spatial Priority Areas) includes key action (Aiii) which focuses on employment growth areas (including mixed use employment site and enterprise zones). The priorities for key action (Aiii) include:
- Accelerate delivery of employment growth areas and supporting infrastructure to facilitate sustainable job growth
 - Identify and deliver upfront infrastructure to tackle development constraints
 - Deliver a comprehensive inward investment and marketing solution for all Leeds City Region Enterprise Zones
- 1.202 The SEP has a place-based focus which applies an integrated set of Spatial Priority Areas. These are set out on page 77 and identifies Chidswell (22), Cooper Bridge (25) and Lindley Moor East and Lindley Moor West as Employment Growth Areas. These are also listed in the table on page 79. Included within these Employment

Growth Areas are the City Regions Enterprise Zones and includes the M62 Corridor Enterprise Zone capturing sites within Kirklees (page 80).

- 1.203 These new Enterprise Zones capitalise on existing concentration of manufacturing businesses within West Yorkshire, maximising the value of the M62 Corridor as a strategic location ideally suited to facilitate access to a wide pool of skilled workers and has the potential to deliver approximately 100 hectares of new employment land for the advanced and innovative manufacturing sector (page 81).
- 1.204 Although not located along the M62 corridor, site E2333a is of strategic significance to the Kirklees district and in particular in meeting the needs and growth aspirations of established manufacturing and engineering firms in the South of Kirklees. Junction 39 of the M1 falls within a 10 minute drive time making the location of E2333a the most accessible to the strategic road network in the Kirklees Rural sub-area.
- 1.205 The allocation of site E2333a is therefore consistent with the objectives set out in both the KES and LCR SEP, particularly with supporting the objective of driving forward growth in the advanced manufacturing and precision engineering sector. The scale and location of the site ensures market attractiveness for those businesses in the Kirklees Rural sub-area who's growth aspirations cannot be met from their existing locations and therefore need to relocate to realise any further growth potential.

c) How was the site selected and its boundaries determined?

- 1.206 Site E2333a was put forward as an employment site option by the site promoter through the Council's call for sites exercise. This process is set out in the Local Plan Methodology Statement Part 2 (BP23, page 5, paragraph 3.1, bullet 1).
- 1.207 The Council considered all site options put forward, either through the call for sites exercise, a review of existing UDP allocations or the Council's own asset review. These were assessed in line with the methodology set out for development site options in document BP23 at paragraphs 4.15 - 4.63, pages 9 to 21.
- 1.208 Supply within the urban area was identified in the first instance and a critique of this supply was undertaken to understand its role and function. This approach has been set out in the Employment Technical Paper (SD22) at paragraphs 6.19 to 6.27, pages 34 to 38. The conclusions of this exercise determined there to be insufficient land supply within the urban area to meet the OAN derived land requirement and also concluded, from a qualitative perspective that supply within the urban area was not of a sufficient scale or well-located to meet the growth objectives of the manufacturing and engineering sector. This supply also fails to support the economic objectives of the both the KES and the SEP.
- 1.209 Consideration was afforded to the objectives of both the KES and the LCR SEP, therefore priority would be given to those sites that met the criteria set out within these economic strategies - see response to Matter 27, question b) for a summary of these criteria. It was concluded that site E2333a performed strongly against these requirements.
- 1.210 Sites that performed well against the objectives of both the KES and the LCR SEP and did not have any absolute constraints identified through the technical site assessment, were identified as draft allocations.

1.211 The initial boundary of site E2333a was put forward by the site promoter. Site E2333a is bisected by Wakefield Road and is bounded to the south by the River Dearne providing for a strong natural edge to the settlement. The northern boundary of the site was amended from the initial proposal to follow identifiable features on the ground and to reduce the impact on the green belt from development at the northern extent of the site. Kiln Lane presents a strong boundary along the north-western edge. The eastern boundary follows field boundaries and hedgerows which provide for a defensible green belt edge.

d) Where relevant, has the impact of the proposal on heritage assets been adequately assessed and addressed?

1.212 This site lies 750 metres from the boundary of Bretton Hall a Grade II Historic Park and Garden. It also lies 750 metres from some Iron mining shaft mounds and medieval earthworks which are designated as a Scheduled Monument. Employment development in this location could harm elements which contribute to the significance of this area.

1.213 An assessment has been undertaken of the contribution which this site makes to the Historic Park and Garden at Bretton Hall and what impact the loss of this open area and its subsequent development might have upon its significance. Historic England welcomed the production of this Statement (SS3, Clayton West – Landscape Statement - Issue 10) and feel it will greatly assist in better understanding the potential impact which the development might have upon the Grade II Registered Historic Park and Garden at Bretton Hall. This Statement incorporates further work that Historic England felt was necessary to clearly demonstrate that the development of this area will not harm elements which contribute to the significance of the Historic Park and Garden. Given the conclusions of the Landscape Statement, it is considered that the development of this site will not harm elements which contribute to the significance of this landscape. For this reason the Council considers that it has been demonstrated that E2333a is capable of being brought forward for development in a manner consistent with the appropriate conservation of the heritage assets in its vicinity. The statement sets out heritage recommendations for the development and landscaping of the site.

e) Does the Plan provide sufficient detail regarding the location and extent of any non-developable areas or buffer zones required to protect residential amenity/biodiversity/historic assets/highways works?

1.214 The plan provides sufficient detail regarding the location and extent of any non-developable areas or buffer zones, an indicative capacity is provided (59,044 sq m); this capacity is based on a net site area taking into account non-developable areas, Flood Zone 3b and a UK BAP Priority Habitat. This has been represented on the indicative masterplan (SS3).

1.215 The plot ratios as recommended by Roger Tym also take account of the need for circulation space, car parking and landscaping. This is set out in CR25 at paragraphs 4.14 to 4.15 and paragraph 4.21. The Council are therefore confident that indicative site capacities are appropriate and take account of a broad range of constraints outside of those already identified and netted off from the developable area.

- 1.216 Policy PLP5 of the Local Plan requires that masterplans be submitted prior to the submission of a planning application. This is an appropriate mechanism to define the location and extent of any non-developable areas or buffer zones.

Residential Amenity

- 1.217 The plan provides sufficient detail regarding the location and extent of any non-developable areas or buffer zones required to protect residential amenity. The site text box states that residential amenity will need safeguarding through sensitive siting of buildings and landscape buffer areas. The council consider that this could be achieved at planning application stage or through a masterplan.

Biodiversity

- 1.218 The site is located adjacent to the River Dearne, a UK BAP Priority Habitat; and as such a 10m stand-off is required from the river. Therefore 1.9 Ha has been removed from the developable area has been represented on the indicative masterplan (SS3).

Historic Assets

- 1.219 There are no significant issues in relation to historic assets that would reduce the developable area. The impact of the development on historic assets is discussed at d) above.

Highways works

- 1.220 The Publication Draft Local Plan contains a specific policy on masterplanning which sets out the requirements of a masterplan. Agreed masterplans will be used as the basis by which planning applications submitted on that site will be determined.
- 1.221 Policy PLP 5, Masterplanning Sites states: "Masterplans must involve the all relevant stakeholders, including the council, landowners, developers, the local community, service providers and other interested parties.
- 1.223 Masterplans will be developed in consultation with the council prior to the submission of a planning application. "
- 1.224 In broad terms, masterplans provide design guidance for areas that are likely to undergo some form of change. They will describe and map the overall vision and concept for the proposed development including proposed land uses, urban design, landscaping, built form, movement and access and infrastructure and service provision providing a clear and cohesive framework for development. They will also set out the intended implementation and phasing of development.
- 1.225 Local and Strategic highway schemes to support the delivery of the Local Plan are emerging and developing in conjunction with the progression of the Local Plan. In some cases the final design is not yet finalised. The Council considers that the masterplanning policy allows for detail on **any** highway schemes and therefore associated non-developable areas and/or buffer zones to be provided at the time of application.
- 1.226 The Council considers that Policy TS9 in the plan provides enough information to alert potential developers that a site might be subject to certain constraints as a result of proximity to a strategic transport scheme. The following provides further detail

around the strategic scheme in TS9 and what inflation has been provided in the orange site allocation boxes in Allocations and Designations Document.

- 1.227 The Council considers that there is no requirement to provide detail regarding the location and extent of any non-developable areas or buffer zones required for Highway works as there are no strategic highway works planned either by the Local Highway Authority or Highways England that require any of the land allocated.
- 1.228 Supporting evidence provided by the developer shows that the site could be accessed by either two priority junctions from the A636 or a roundabout. The developer feels this is an acceptable solution for their configuration/requirements and has submitted supporting information to justify this. The Council accepts that in principle both of these options could be acceptable, but as with all the site allocations, more detail will be discussed at planning application stage.
- 1.229 Notwithstanding the above the Council feels that the developable area provided in the orange site allocation box is sufficient for the purposes of the Local Plan in that any infrastructure required to support the site will be of such a minor nature that they will essentially form part of the developable area in this case.

f) Are other constraints such as highways, flood risk, landscaping, drainage and power lines suitably mitigated through Part 2 of the Plan?

- 1.230 The plan provides clear guidance on the requirements and constraints. Pages 15 and 16 of the Allocations and Designations document (SD2) list the constraints and the reports that may be required to accompany the submission of a planning application. Other site specific considerations are also listed along with mitigation measures.
- 1.231 Highways, drainage, flood risk, contamination, noise, air quality, biodiversity and heritage issues are all listed as constraints. The reports that would be required to address these constraints are also listed along with mitigation measures relating to landscape, biodiversity and residential amenity. Site constraints identified in Part 2 of the Local Plan are discussed below:

Highways

- 1.232 TS1, TS2, TS3, TS4, TS5, TS8, TS9, TS10 and TS11 show in strategic terms what transport infrastructure is required to ensure that the district can accommodate the cumulative impact of the development traffic from the Plan's site allocations. From the perspective of viability it cannot be expected that individual sites could fund the level of infrastructure provided, so policy PLP4 in the Strategy and Policies Document exists to ensure that at application stage, due regard is taken of the infrastructure required under the TS designations and that developments should contribute to the provision of infrastructure, taking account of local and strategic needs and financial viability. This may be achieved on-site or off-site through planning conditions or legal agreements and/or through contributions to the Community Infrastructure Levy (CIL).
- 1.233 With respect to local highway constraints, the Council considers that the level of detail will be dealt with and discussed at pre- planning application, where at that point in time a better understanding will be had of what committed developments are in the local area, what the progress is of the larger strategic schemes and at what point they might be implemented.

- 1.234 The developer has submitted a “Transport and Access Appraisal”, contained within their “Representation to Kirklees Local Plan”, dated December 2016 and contained within the Local Plan Examination Library under SS3. The Transport and Access Appraisal contains trip generation and mode share calculations which the Council is satisfied reflect the general quantum of expected trips to be distributed across the local highway network.
- 1.235 The Council has undertaken to distribute these trips onto the highway network using MSOA level census travel to work data and has determined that 63.3% of all “Driving a car or van” trips will use the A636 in an eastern direction and that 36.7% will use the A636 in the western direction. This equates to 2 way peak hourly vehicle flows as follows:

AM		PM	
From/to the site traveling to/from the west	From/to the site travelling to/from the east	From/to the site traveling to/from the west	From/to the site travelling to/from the east
170	293	109	187

- 1.236 Annual average daily flows for the A636 in the vicinity of Scissett (approximately 1.8km from the site) in 2016 show the road carried approximately 8804 vehicles. This is only 111 vehicles ore per day than the road carried in 2008 and 106 less than was recorded in 2000. Calculation taken from a local traffic count shows the peak hourly flows to be about 8% of the total daily flow. Therefore it is expected that the road in this vicinity has a 2-way peak hourly flow of c. 700 vehicles. Even if the count was out by a factor of 20%, the A636 would only be carrying 845 vehicles per hour.
- 1.237 With the proposed development flows added to these figures, the Council considers the highway to function well within its capacity, both in the rural and the through the slightly more built-up village sections to the west where there could be an increase of 296 two way vehicle trips in the peak hour.
- 1.238 As part of the Duty to Cooperate process, discussions have been undertaken with Wakefield Council on the likely impacts at the junction of the A637 and A636 which is in Wakefield district. Wakefield made the following comment in relation in this site:

“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 and further work is not required at this stage. As such, we will work with Kirklees Council over time to discuss cross-boundary infrastructure and traffic impact issues”

- 1.239 The evidence presented is considered sufficient to justify the inclusion of the site at allocation stage from the perspective of highway impact. In addition, the Council feels that the extent of the impacts will be such that they can be adequately dealt with at application stage and that there is no need to provide further information in the plan.
- 1.240 With regard to the Strategic Road Network and specifically Site E2333a, the council and Highways England agree that there are no Strategic Road Network constraints that require mitigation through Part 2 of the Plan. The site allocation box for E2333a in Part 2 of the Plan requires a Transport Assessment to be carried out at application stage. The council will expect this to assess whether there are any Strategic Road Network constraints at the time of application and to identify how these constraints (if present) could be suitably mitigated through a Travel Plan or other measures. Policy

PLP 4 enables the Council to seek contributions towards additional mitigation measures allocations that do not in themselves generate a significant impact upon the Strategic Road Network (i.e. E2333a) if a Transport Assessment deems it necessary. These contributions would be sought in accordance with Paragraphs 204 and 173 of the NPPF.

Flood Risk and drainage

- 1.241 This is not considered to be significant and could be addressed as part of a detailed planning application. The site falls within Flood Zones 2 and 3 and a very small area falls within Flood Zone 3b as defined by the EA Flood maps. As such the area within Flood Zone 3b (0.08 Ha) has been removed from the developable area.
- 1.242 The submitted drainage and flood risk assessment (SS3) confirms that in order to ensure that the proposed development does not increase flood potential elsewhere, development will be retained within the Flood Zone 1 areas.
- 1.243 There are notable opportunities to include sustainable drainage measures within the development. To this end an area has been set-aside on the illustrative masterplan (SS3) for 'balancing ponds'.

Environmental Health

- 1.244 These are not considered as significant issues and could be dealt with through the planning application process.
- 1.245 The submitted supporting evidence (SS3) concludes that noise may not be an issue as there is a lack of notable sensitive receptors close to the allocation site and the ability to control these matters through appropriate site design means that it is unnecessary to impose this requirement.
- 1.246 In addition an assessment of prevailing ground conditions has been undertaken (SS3 Appendix 10). It concludes that the site presents a 'medium' risk potential which is capable of reduction or mitigation following further assessment. There are no matters identified within the assessment to prevent development from taking place on site.

Biodiversity

- 1.247 The River Dearne flows along the southern boundary and is a UK BAP Priority Habitat. A minimum stand-off of 10m from the river should be provided, ideally more and planted with locally native woodland species. Light pollution and other forms of disturbance to the river environment should be minimised. Appropriate protected species surveys should be undertaken and mitigation measures provided.
- 1.248 An assessment of the ecological potential of the Site has been undertaken (SS3 Appendix 11) and concludes that retention of appropriate landscaping elements and provision of new landscape linkages and development buffers will ensure that development does not have an adverse effect.
- 1.249 The potential to provide a significant area of new strategic landscaping within the allocation along its northern extent has the potential to provide new habitats connecting into existing boundary features and corridors to the benefit of the site's ecological biodiversity.

Landscaping

- 1.250 The submitted landscape character assessment (SS3 Appendix 9) has concluded there to be no significant issues. Recommendations put forward demonstrate that appropriate levels of mitigation can be implemented to off-set the impact of development.

Residential Amenity

- 1.251 It is considered that the impact that the development may have on residential amenity could be addressed through appropriate design, layout and use of buffers as part of a detailed planning application. It is listed as a site specific consideration and as such it is made clear that mitigation is required.

g) What effect would the proposed boundary changes and allocation have on the Green Belt and the purposes of including land within it? Are there exceptional circumstances that justify altering the Green Belt? If so, what are they?

- 1.252 The full green belt assessment for this site is set out in the appendix at the end of this hearing statement.
- 1.253 This site is required to meet the objectively assessed need for strategic employment locations in the district and as such exceptional circumstances exist to amend the green belt boundary. This is based on market need and locational demand and ensures that employment land is available to meet the aspirations both of the Kirklees Economic Strategy and the Leeds City Region economic market area. After due consideration of all relevant non green belt alternatives, the need to promote sustainable development patterns, the role and function of the green belt and the specific characteristics of this site, it is deemed that in this instance the benefits of facilitating employment development on the site outweigh the loss of this part of the green belt.
- 1.254 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.
- 1.255 The exceptional circumstances that exist to justify altering the green belt have been provided to the inspector in document EX36 Employment Land Supply Briefing Note. This concludes that the supply of land in the urban area is limited in terms of its ability to deliver on the economic objectives for Kirklees and the Leeds City Region but does play an important role to support SME operations. In view of this consideration has been given to the need to release land from the green belt to ensure sites of sufficient scale in locations which can take advantage of the motorway network have been taken into account.
- 1.256 The conclusion of this exercise identified that exceptional circumstances exist if the Local Plan is to meet the needs of the Kirklees economy in full – as agreed with neighbouring authorities through Duty-to-cooperate discussion (SD14, page 16, 10 paragraph 5.12) and to ensure the delivery of both the Kirklees Economic Strategy and the Leeds City Region Strategic Economic Plan.

h) Is the proposal viable and deliverable? What are the anticipated timescales for delivery? Are there phasing implications arising from impacts on the Strategic Road Network and funding availability?

- 1.257 The council considers that this proposal is viable and deliverable. A Market Assessment has been prepared (SS3 Appendix 6) which concludes that the lack of available commercial space and deliverable sites within Clayton West and the South Kirklees functional economic market area to accommodate occupiers' requirements has led to significant latent demand for employment space. This development would create a critical mass which could result in an employment land delivery rate of 2,322 sq m per annum, thus leading to a further 27,870 sq m (300,000 sq ft) to 37,160 sq m (400,000 sq ft) over the Plan Period.
- 1.258 Added to the identified latent demand, this 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). The Council's suggestion that land is necessary in Clayton West to provide an additional 52,155 sq m of development is considered wholly appropriate and sound in market terms.
- 1.259 This is a large strategic site. Based on available evidence there is demand for the site, there is a willing landowner and there are no significant constraints. It is anticipated that it will be fully delivered by the end of the plan period.
- 1.260 There are no phasing implications arising from impacts on the Strategic Road Network and funding availability. E2333a is modelled by Highways England as generating a less than significant impact on the Strategic Road Network.

Matter 27: Impact of the allocation on the Green Belt and the purposes of including land within it

Strategic Employment Allocations

Green Belt Review tests 2 and 3

The edge reference and value reflects the Green Belt Review outcomes (SD19 and SD20)

Tests 2a to 2c are site specific assessments of the degree to which land performs a green belt role and function following the methodology for those tests set out in the Green Belt Review (SD19)

Test 2d defaults to 'green - no impact' in all cases. This follows Stage 1 hearing discussions and is set out in the Council's note; Green Belt Review (SD19) Test 2d Reassessment (ID17). Struck-through text removes reference to the setting of historic assets.

Test 3: One of the purposes of including land in the green belt is “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (Green Belt Review page 17). By constraining the potential for the expansion of built-up areas the green belt will direct development pressure towards opportunities to recycle land within urban areas and thereby achieve urban regeneration. The green belt is considered to support this green belt purpose equally throughout Kirklees. Test 3 is not included within the Green Belt Review matrix (Green Belt Review Appendix 1) and the Test 3 column is therefore neutral.

Site Allocation Methodology

Site specific assessment of the ability of the site to present a strong new green belt boundary and its relationship to the existing settlement form, following the assessment methodology set out in BP23 Local Plan Methodology Statement Part 2

		Green Belt Review					Site allocation methodology		
		Test 2				Test 3			
Option	Edge ref and value	2a: merger	2b: sprawl	2c: encroach-ment	2d: historic towns	urban regen-eration	Suitability of potential boundary	Relationship to settlement	Assessment set out in BP29.1
E1831 Whitehall Road Scholes Cleck.	Detached	Impact on restricted gap to Scholes	Degree of sprawl down slope from Whitehall Road but roads form strong boundaries	Some countryside character - istics but limited by surrounding urban form	No impact		Good	Settlement extension - relationship to significant cluster of accepted options. Additional land release required	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.
E1985a North Bierley WWTW	Detached	Some impact on restricted gap to Bradford	Well contained	Not part of wider countryside	No impact		Good	Waste water treatment works	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.
E1832c Cooper Bridge	CB1_3	Impact on strategic gap with Calderdale	Large site but well contained by land use features	Encroach - ment into countryside	No impact		Good	Settlement extension	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.
E2333a Clayton West	CWS11_B, CWS11a_2 CWS12_5	No impact	Southern part well contained; northern part increasingly prominent on rising land	Part of wider countryside. Impact on river and its setting. May encroach into views on rising land to north	No impact		Northern boundary does not follow ground feature over short distance	Settlement extension.	The developable area of this site south of Wakefield Road is separated from Clayton West by the River Dearne and its associated important wildlife habitats, however it should also be recognised that the current adjoining factory and its substantial hard standing areas mean that this site is an extension to the urban area. The northern section of the site is also well related to the settlement as there are properties at Park Mill House between the site and the edge of the settlement. 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.

**Cooper Bridge:
Public Benefits and Exceptional
Circumstances**

January 2018

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1. Introduction

- 1.1 This report has been prepared to set out the landowner's views on the exceptional circumstances which justify this site being removed from the Green Belt, as well as the public benefits which will arise from its development.
- 1.2 This should be read alongside the heritage assessment prepared by FAS.

2. Scheme evolution and boundaries

- 2.1 The scheme has evolved, principally in response to heritage concerns, to relocate and reduce the amount of land to be released from the Green Belt.
- 2.2 Previous iterations of the scheme masterplan extended further north, and had boundaries that followed contour lines (site options E1832 and E1834). This approach which was adopted to ensure that the development sat well within the landscape. This, however, has changed to allow the site boundaries to follow more permanent and easily recognisable features on the ground.
- 2.3 The accepted site option (E1832c) extends further east as oppose to north to follow permanent features, thereby providing for a more defensible green belt boundary. This is considered to accord with the guidance in Paragraph 85 of NPPF. The boundaries now follow a combination of roads, woodland blocks and well established existing field boundaries. These boundaries are now as follows:

Land south of the A644 / Leeds Road:

- 2.4 This area is not in the Green Belt, but is bounded by the A644, existing development, a railway line and the River Calder.

Land north of the A644 / Leeds Road:

- 2.5 The western area is bounded by the A644 / Leeds road, the southern extent of Nun Brook Wood and the woodland associated with the Nun Brook stream corridor. The western boundary is currently formed by the administrative boundary with Calderdale Council.
- 2.6 The landowner submitted representations to the Calderdale Local Plan Initial Draft 2017 Regulation 18 Consultation (held 4th August to 29th September 2017) to seek the allocation of the land immediately adjacent to this boundary. If allocated this would bring the Green Belt boundaries in this area in line with a road, which is considered to fully comply with guidance. However, if the adjacent land is not also allocated, the western boundary would follow an existing field boundary, which could be strengthened with further planting to ensure a strong and easily identifiable boundary. It is the Council's view that access can be achieved without the need to amend or delete the green belt in Calderdale.
- 2.7 The western area is bounded by the woodland along the Nun Brook corridor, Dockentail Wood and, to the south and part of the eastern boundary, existing field boundaries, a stream and a footpath. These latter boundaries would be strengthened by further planting, but in any event follow readily recognisable features on the ground.
- 2.8 The scale of the site has been determined based on a number of factors, including both the availability of suitable boundary features, as described above, as well as the likely viability of the development and the scale of need established in the Local Plan evidence base.
- 2.9 As noted above the site boundaries have been selected to follow readily recognisable physical features on the ground. Consideration was also given to the need to ensure

that suitable market opportunities were available on sites which are located in close proximity to the motorway network and have good access to existing clusters of businesses.

3. Market Demand

- 3.1 The evidence included in the Local Plan submission has been supplemented by a review of the market for new floorspace in this sector and local area. This market review has been undertaken by Dove Haigh Phillips. It concludes that the market has reached a point in the economic cycle where it no longer suffers from oversupply of buildings or serviced sites.
- 3.2 The majority of the empty units which were built immediately before the recession in 2008-2012 have now been absorbed by an upsurge in demand. The market is now operating on the traditional route of “build to suit” or pre-let / pre-sale agreements, where developers provide buildings according to known occupier requirements. E1832c supports an identified market need and would likely operate on a “build to suit basis”. In order for the market to operate in this way, there needs to be a supply of available and deliverable sites which are suitable for strategic employment needs.
- 3.3 Financial support from banks and other lenders remains cautious, and as such prime sites are likely to be most favourable. Sites with key attributes will continue to attract interest from end users and it is likely that a two tier market will emerge, with secondary sites being unable to deliver appropriate accommodation for new high quality enquiries.
- 3.4 The Cooper Bridge location is a competitive one, as it has excellent transport links to Junction 25 of the M62, access to an economic labour pool, and represents good value for leasehold and freehold property terms. Key occupiers have continued to be attracted to the Junction 25 area during difficult market conditions.
- 3.5 Against a backdrop of difficult market conditions and a general reduction in occupier’s requirements, the area has performed well over the past 5 years. A number of key occupiers are located within relatively close proximity to E1832c, including:
- M&S Distribution at Newhall adjacent to the M606 – 1,100,000 sq ft unit
 - P&B Foods at Newhall – developed their own premises on a 10 acre site
 - Various new occupiers in trade units to the southern side of Chain Bar (M62 J.26)
- 3.6 There are a number of current occupiers in the market with known requirements. There is also potential demand from indigenous occupiers seeking accommodation suitable for expansion in Kirklees. There are no buildings or sites which can accommodate these requirements, even with existing market churn, given that existing vacant buildings and sites are unsuitable.
- 3.7 Current employment stock cannot meet the growth aspirations of indigenous businesses within Kirklees or of potential inward investors. A number of occupiers across West Yorkshire are seeking to relocate and expand in the region but current site options are very limited. As a result, leases are being renewed on flexible terms to allow relocation within 3-5 years. Consequently, there is a need for sites to be available which can quickly respond to meet this anticipated demand.

- 3.8 Demand is likely to result in activity in the sector in the short term. Two sites in particular are already meeting some of this demand as they have good availability and Enterprise Zone status; Lindley Moor (Summit Park) and Mirfield (Moor Park).
- 3.9 Three expressions of interest for this site have already been submitted from local occupiers. They have also asked to be kept informed of opportunities to acquire new accommodation on site, subject to planning.
- “Company A” – A food manufacturer currently based within 5 miles of the site seeking a five acre site for new production facility.
 - “Company B” – A floor covering distributor with two smaller facilities seeking to consolidate onto a single larger facility.
 - “Company C” – An electronics distributor focussing on expansion into the online market with existing facilities in Kirklees and the Midlands.
- 3.10 There are a number of occupiers which have active requirements in the market and the existing supply of buildings to suit modern requirements is low. Although availability does remain, this is not a result of over-supply. In certain instances the accommodation on offer is compromised and is difficult to let or sell unless at eventual discounted terms. There have also been some buildings returned to the market due to business failure.
- 3.11 Market confidence exists. A number of enquiries from occupiers interested in acquiring substantial areas have also been expressed pending planning approval.
- 3.12 E1832c is sustainably located and has the ability to meet the needs of a modern market. There is current and likely to be future demand for this site. Furthermore in terms of Gross Value Added, the Economic Benefits Summary Statement (Appendix 1) which supports this statement outlines that E1832c will produce £45.5 million over the construction period, and £102.1 million per annum once operational, within Kirklees.

4. Amount of land required and reasonable alternatives

- 4.1 The Local Plan proposes to allocate 167Ha of land for employment (net). An element of this supply will support strategic objectives, therefore locational criteria included:

Proximity to motorway junctions

Topography (larger flat sites being preferred)

Proximity / accessibility to an established workforce

Capability to provide an efficient layout and parking

Environmental attractiveness

- 4.2 The landowner has reviewed the available and proposed land supply, as well as other potential options that have not been proposed for allocation.

- 4.3 The Publication Draft Local Plan proposals maps have been reviewed to establish where the larger employment and mixed use sites are relative to the key motorway junctions in Kirklees. These are:

Site	Use	Reference	Hectares (Net Employment)	Status
Chidswell	Mixed	MX1905	35.17	Greenfield, Green Belt
Cooper Bridge	Employment	E1832c	35.18	Greenfield /Brownfield, Green Belt / Unallocated Urban land
North Bierley	Employment	E1985a	7.61	Brownfield / greenfield; Green Belt
A58/ M606, Cleckheaton	Employment	E1831	24.57	Greenfield, Green Belt
Slipper Lane, Mirfield	Mixed	MX1929	6.15	Greenfield, Employment Allocation
Lindley Moor	Mixed	MX1911	8.00	Greenfield, Employment Allocation
Total			116.68	

- 4.4 The supply set out above represents those sites with the capacity to serve the needs of businesses with locational requirements in close proximity to the motorway corridor in the north of the District. Furthermore this total amount is not adequate to meet the entire identified need for the District. The table above only presents those sites which are in close proximity to the motorway corridor and it is not the purpose of this statement to review the entire employment land supply, particularly the smaller, existing allocated sites which are less likely to come forward or make a meaningful contribution to supply. The listed sites would offer good potential for modern accommodation in an attractive setting and most are new, or relatively new, to the market.
- 4.5 A review of alternative employment land supply around motorway junctions showed that some immediate supply is available (in Lindley and Mirfield) but that this would not provide for the needs of larger businesses - particularly advanced manufacturing and logistics. Nevertheless, SME operations would be well supported.
- 4.6 Other potential sites have been identified at:
- Howden Clough Road, adjacent to Birstall Retail Park, J27 M62 (Site 1)
 - Whitehall Road West, Hunsworth J26 M62 (Site 2)
 - Bradford Road / Sykes Lane, Oakenshaw, J26 M62 (Site 3)
 - Oakenshaw Lane, Oakenshaw, J26 M62 (Site 4)
 - Brighouse Road, Ainley Top, J24 M62 (Site 5)
 - Land to the rear of New Hey Road, Mount, J23 M62 (Site 6)
- 4.7 Each of these sites is greenfield and within the Green Belt. The existing and proposed employment land supply sites are reviewed further below.

Extant Permissions

- 4.8 There are two sites with recent employment permissions which will add to the supply and which are also available now to meet immediate needs. Both of these sites are greenfield but are employment allocations in the current saved UDP (adopted 1999).
- 4.9 As these sites have extant permissions, they can potentially meet immediate needs before land is allocated in the plan, and, as such, may suggest that an early release is not justified.

Slipper Lane, Mirfield (MX1929)

- 4.10 This site is a UDP employment allocation (ref B9.2). It has therefore been allocated for a considerable period of time and is not a new prospect for the market.
- 4.11 The site secured outline planning permission in 2014 (reference 2014/90688). The permission provided for a mix of housing (166 homes) and employment uses (17,233 sqm/185,500sqft). The Publication Draft allocation provides for 17,234sqm (185,505sqft) of employment uses.

- 4.12 As one of the UDP allocations, the site has a history of planning permissions being secured. In 2008, permission was secured for a Care Village and B1/B2 uses. A second application for B2/B8 uses was approved in 2012, for a sub-regionally based gearing business. The care village/employment development permission was renewed in 2013. The site has a history of non-delivery of permissions over the last 8 years, although the current permission requires the housing development to cross subsidise infrastructure works to help bring forward the employment development.
- 4.13 The employment development has access approved, but other reserved matters are yet to be submitted. The S106 requires the following works to be delivered on the employment land, before construction of the first house on the site: delivery of site accesses, earth works to level the site, site remediation and servicing to development plots.
- 4.14 This will assist in marketing the site and will make it more attractive to occupiers looking for a building in the short term. A developer is currently examining bringing forward this site and has potential occupier interest for a unit on this site. This site is therefore quite likely to cater for an element of latent demand. However, in terms of scale, the site is limited in its own right (17,234sq m/185,500sq ft) and the size of units achievable is also limited. The illustrative masterplan shows a range of smaller units, the largest being 4,646sqm (50,000sq ft), although there is potential for a larger unit on the site. This site will cater well for smaller businesses, start-ups and businesses looking for better quality buildings or an improved environment.
- 4.15 This site benefits from permission and commitments to deliver infrastructure works. As such, it is likely to provide a short term supply for immediate needs, at the smaller end of the market.
- 4.16 There remains a need for short and medium term opportunities for larger buildings marketed at already successful and growing businesses.

Lindley Moor (MX1911)

- 4.17 This site is also a UDP employment allocation (ref B8.1). It has therefore been allocated for a considerable period of time and is not a new prospect for the market.
- 4.18 Part of the UDP allocation B8.1 (which is largely the same as proposed allocation MX1911 in the Local Plan) secured planning permission in 2015. The permission was in outline for 19,510 sqm (210,000 sqft) of employment development. Full permission was also sought for 252 dwellings. The scheme was subject to a S106 agreement which would secure access improvements, highways works, diversion of pylons, drainage works and cut and fill of the employment land. The inclusion of housing on the employment land was justified on the basis of higher value uses being needed to deliver the employment development.
- 4.19 The illustrative masterplan shows 2/3 units, one of 4,645sqm (50,000sqft) and the other(s) at 9,290 sqm (100,000sqft) + 5,574sqm (60,000sqft) or a combined 14,864 sqm (160,000sqft).
- 4.20 This permission has potential to deliver in the short term and can offer a larger building for any businesses needing to expand from an already strong base.

- 4.21 This site also therefore benefits from permission and commitments to deliver infrastructure works. As such, it is likely to provide a short term supply for immediate needs, at the small and medium end of the market. However, based on the illustrative masterplan, the site is only capable of supporting one larger building, which is a very limited supply given the weight attached to growth in advanced manufacturing and the need for large releases of land for intensive logistics developments.
- 4.22 A proportion of the allocated site, to the east, is not subject to this permission. It is likely that this area has been excluded because it presented challenges to the development team, either from a technical or landowner perspective. If this remnant area of the site was capable of quickly being developed to meet employment needs, it is highly likely that it would have been included in the current permission area. Rather, it has been allocated for 17 years and has not come forward. Whilst it remains an area of land that should be pursued for employment development, it is not likely to deliver in the short term.

Committed sites pipeline

- 4.23 The review of the Slipper Lane and Lindley Moor sites above shows that there is a committed supply of land which is broadly capable of meeting immediate needs.
- 4.24 However, a review of the pipeline of recently consented sites which meet the relevant site selection criteria set in the draft Local Plan technical paper suggests that on the basis of average take up, these consents will provide only a fraction of the land needed to ensure a steady supply of good quality employment land to the market.
- 4.25 The Local Plan Employment Technical Paper (SD22) notes² that 10ha of land has been taken up on average every year since 2004-5. This is a “policy off” average, which reflects the average performance of the market over a 10 year period. Notably, at least 8 years of the monitoring period of 2004-2014 was after 2006, which is the end point of the UDP’s planned land supply.
- 4.26 A 10ha take up represents a development footprint for this type of development³ of some 40,000sqm (430,556sqft). These two sites have consent for a total of 36,742sqm (395,487sqft) of space. These sites therefore represent only 91% of a single year’s supply.
- 4.27 However, this calculation represents take up in a “policy off” scenario and notably covers a period when the supply of prime sites has been significantly limited, thus limiting the potential for take up through supply constraint. These factors in turn would significantly decrease the percentage supply these sites offer.
- 4.28 To illustrate this, the Publication draft Local Plan covers the period 2013 to 2031 (18 years) and anticipates that 216ha of land will come forward over the Plan period (taking account of completions, commitments, supply from previous permissions and the delivery of Local Plan allocations) . On an annualised basis, this equates to 12ha per

² Table 3 at paragraph 6.3 of the employment land technical paper

³ 10Ha = 10,000sqm x 10 at 40% site density = 40,000sqm pa / 430,556sqft pa

annum. These sites would therefore only equate⁴ to 76% of a year's supply in the "policy on" scenario.

- 4.29 The emerging plan runs from 2013, i.e. 4 to 5 years ago. 8ha of land was taken up in the 2013-14 monitoring period⁵. Monitoring figures for 2014-15 are not provided in SD22, but it is clear that there is already a shortfall against the plan period delivery.
- 4.30 The Local Plan is not likely to be adopted until late 2018. This is 5 years after the plan start date meaning that around 58ha of land needs to be released and developed to simply keep pace with the average annual rate for the plan period up to adoption.
- 4.31 Clearly, this will average out when larger sites are released when the plan is adopted, although it does suggest that in order to avoid a future shortfall, which would damage economic progress and realisation of the plan's objectives, it is necessary to consider releasing some additional land in the short term and before the plan is adopted.
- 4.32 It also suggests that MX1929 and MX1911 (two sites which have struggled to deliver, and which amount to two-thirds of a year's supply), are far from adequate to meet the needs of the District's primary opportunity for economic growth.
- 4.33 Furthermore, this analysis is set in the context of there being no employment land allocated in Kirklees since 1999.
- 4.34 In addition, the sites currently proposed for allocation also have a lead time to deliver development, which needs to be taken into account in delivering a pipeline of sites which can meet market needs.
- 4.35 It is clear that the committed development sites are not adequate to meet the needs of the advanced manufacturing/logistics sector in the run up to the adoption of the plan. There remains a need to secure further opportunities which can begin addressing constraints before the plan formally allocates sites by way of adoption.

Primary Employment Area sites

- 4.36 These existing employment areas where the supply is constrained (due to access and shape) and which offer generally poor quality land of a limited size. Minor expansion and small new build to meet the SME market is still taking place within Primary Employment Area sites.
- 4.37 As such, they present a limited opportunity for new land to be developed. Many of the sites do offer potential for small new buildings, or small scale expansion of firms adjacent to gap sites within the PEA and so will form a part of the overall supply. However, many do not share the locational advantages of the potential new sites in the area and most are highly constrained. They are also well known to the market and opportunities haven't been taken up for the reasons set out.
- 4.38 Taking several examples of PEAs close to the motorway corridors as examples:

⁴ 12Ha = 10,000sqm X 12 at 40% site density = 48,000 sqm pa / 516,667 sqft pa

⁵ Table 3 para 6.3 Local Plan Technical Paper.

- Site B&S3 (Oakwell Industrial Park, Centre 27 Birstall, 63.41ha) is proximate to the M62 / M621 and has a vacant site with potential for a separate access onto an estate road. However, it is at the rear of the park and is some 2.3ha in size. At 40% site density it could accommodate a unit of roughly 100,000sqft (around 10,000sqm), although it is triangular in shape which would limit site efficiencies considerably, meaning that a smaller unit would only be achieved in reality. This is an example of a good available site, in a modern context within the PEA. It could feasibly serve local expansion needs but its contribution would be limited and in line with the normal performance of the employment market in Kirklees. It has been on the market for some time.

- Site B&S11 (West 26 / Stubs Beck Lane, Cleckheaton, 11.56ha) is in an excellent and high profile location, at the junction of the M62 and M606, on relatively flat land with good access to markets and a labour force. This would meet the locational requirements set out in the agent's survey undertaken as part of the local plan evidence base. However, there is currently no accessible land within the PEA boundary which could accommodate new development. There is landscaping and scrubland between the built development and the motorway junction roundabout which could feasibly accommodate additional development, but it would need to be accessed through either existing development or directly off a busy roundabout with a sub-optimal access arrangement (e.g. a left in / left out only access). This land has also been visible to the market for some time

- Site HUD5 (Mamas & Papas, Colne Bridge, Leeds Road, 6.25ha) is in a good location, just off Leeds Road with good access to the M62 via Cooper Bridge. There is vacant land in two areas: one within the curtilage of one of the Mamas & Papas buildings between the warehouse and car parking, which is only really suitable for a very small scale extension, more car parking or some smaller ancillary building associated with the existing operation. The second area is roughly square and around 1ha in size. At 40% site density, this could accommodate a 4,000sqm/43,000sqft building. Again, this is a small building in a good and well-known location. However, similar to the sites above, it is clearly not adequate to deliver the kind of step change in offer which is needed to transform the market.

- Site B&S1 (Grange Road Industrial Estate, Batley, 14.22ha) is removed from the motorway network but has moderate access to the M1 Motorway via Ossett in Wakefield District. It has one vacant area which is roughly rectangular and bounded to its east and west by industrial development and its north and south by residential development. It has no road frontage but there is a dirt track which runs between Mill Forest Way and Fort Ann Road, which is not suitable for vehicular access. This site is 0.65ha and at 40% site density could accommodate a building of around 2,600sqm/28,000sqft. Given the access constraints, this building capacity could only feasibly be used as an extension to the adjacent building. Again, this theoretical hectareage could only serve a local/churn-based need.

4.39 As can be seen, the PEA sites in good locations are sites which are well-known in the current market and, given the age of the current land supply, do not present a new resource for businesses seeking new accommodation for an expansion or relocation to a prime position. Whilst they add a theoretical capacity to the land supply in the District, they are clearly not suitable to drive forward a transformational policy approach.

4.40 In summary, we consider that the PEAs are:

- (i) Not a reliable source of supply. Many are constrained, small and in remnant locations within the wider sites following development of the better parcels of land;
- (ii) Most suited to the expansion of existing businesses, particularly those within the PEA already. Some are so constrained that they can only meet a direct extension need, whilst others may be suited to smaller businesses in new units, but are still fundamentally constrained sites even within the better located PEAs;
- (iii) Offer nothing new to the market. These are not new employment sites. They have been available to the market for a considerable period of time. Their lack of development suggests that whilst they theoretically exist as supply, they are not likely to be taken up quickly or enthusiastically by the latent demand identified in the evidence base. If they were attractive to that demand, they would have been taken already;
- (iv) Unlikely to help drive the economic change sought by the Council's Economic Strategy. For the reasons set out above, the PEAs will not meet the need for new, strategically located and good quality sites identified as what is needed in order to drive Kirklees' economy forward. The market needs fresh top quality sites, rather than a theoretical supply based on old sites which may be suitable for employment use, but which are not the best available to meet modern requirements. The need for new strategic sites is consistent with the evidence base, and an initial analysis of several opportunity sites in the PEAs supports this view.

4.41 On this basis, we consider that this source of supply cannot be relied on to stimulate the growth which is needed to drive the Kirklees economy

Publication Draft Local Plan Strategic Sites

4.42 In order to meet the identified need, the draft local plan identifies several new strategically located employment sites. These include sites at Cooper Bridge (46ha, Site E1832) and Chidswell (35.17ha, providing 1.3msqft of employment alongside 1,535 dwellings, Site MX1905). These sites are noted in the Leeds City Region Strategic Economic Plan (CR9) as being of strategic importance and should therefore be priorities for development.

Cooper Bridge (E1832c)

4.43 The employment site at Cooper Bridge (46ha) is a very well-located site with good access to the motorway and in the right area to benefit from proximity to businesses serving the South Calderdale – North Kirklees - South Bradford manufacturing arc. It is

well placed to serve the needs of businesses which are expanding or new start-ups in the areas priority sector. It has the potential to provide exactly the kind of accommodation noted as being required, namely new premises in close proximity to the motorway and workforce, in a high quality environment and with little congestion. This site would clearly help to meet the need identified in the supporting evidence.

- 4.44 E1832cis also likely to provide accommodation for precision engineering and advanced manufacturing, as well as logistics and distribution buildings which are related to this key growth sector. It will also be attractive to more general B2/B8 Use Class provision, given the lack of larger flat sites at this end of the West Yorkshire conurbation.
- 4.45 These uses are less dense and will therefore require more land within the overall allocation. However, such support uses are critical to the success of a well-functioning cluster of engineering and manufacturing activity. Successful businesses require efficient logistics to secure components, consolidate and assemble components and export them to the end user. Without such support the businesses in the cluster will be less efficient and therefore less attractive.
- 4.46 The site is well-contained by recognisable features and topography, and has the potential for boundaries to be further strengthened without impacting on site capacity due to wider land ownership. The release of the site will not result in the erosion of a strategic gap in the Green Belt and will not lead to the unconstrained sprawl of development in the countryside by virtue of its boundary features. The release of this land would not undermine the functioning of the wider Green Belt and, in the context of the identified need, we consider this to be a justified release of land, and there to be exceptional circumstances that justify altering the Green Belt at this location.
- 4.47 E1832c also has constraints (including heritage). It is partially previously developed, but is largely greenfield and requires highways improvements to be undertaken using, in part, public funding sources. Whilst this site is recognised as being sub-regionally important, it is likely to have a reasonable lead-in time to development.
- 4.48 In our view, whilst it is an important site in the context of the Local Plan (in terms of its ability to meet an immediate employment need) we consider that it is not likely to deliver a meaningful supply of land in the next 1-5 years, but will provide an essential component of new attractive land with additional local transportation benefits.

Chidswell (MX1905)

- 4.49 The site at Chidswell is a major strategic release of 121ha, which includes 37.17 ha of employment land. Nevertheless, the majority of this site will focus on delivering housing development. The plan envisages around 122,500 sqm (1.3m sqft) of employment floorspace.
- 4.50 This site is relatively well-contained by existing development and well-defined field boundaries/woodland blocks. It is entirely greenfield and Green Belt. It does represent a large release of land and thus will inevitably change the settlement pattern and reduce the separation distance between Chidswell and Tingley/Gawthorpe. However, it will not result in coalescence or unnecessary sprawl into the countryside, in the context of the identified need for housing and employment land. The release of this land would not

undermine the functioning of the wider Green Belt and, in the context of the identified need; it is considered to be a justified release of land.

- 4.51 The Publication Draft Local Plan notes that third party land is required to deliver access. Aerial photography reveals that the eastern and northern edges of the site, which would offer the best accessibility to the motorway (M62, J28 at Tingley) are lined with residential properties. This will be affect where in the site the employment development can be best located.
- 4.52 As the site has a residential focus it is considered that it is also likely to have a reasonable lead time before development can take place. On this basis, we consider that it is unlikely to deliver meaningful employment space in the next 1-5 years.

Strategic Sites Overview

- 4.53 Given the period that has elapsed since new land has become available, the likely latent demand and the priority being given to the precision engineering and advanced manufacturing sectors in the evidence base for the emerging plan, it is our view that further sites, which are capable of delivering in the shorter term, need to be considered for release in the short term.

Publication Draft Local Plan: Proposed Allocations

- 4.54 There are also two employment allocations proposed for allocation in the Publication Draft Local Plan. These are at land at the A58/M606, Cleckheaton (24ha, Site E1831) and North Bierley (7.61ha, Site E1985a).

A58/M606, Cleckheaton

- 4.55 This site is located just off the M62/M606 junction and, as such, is in an excellent location. It is also accessible to a strong workforce in Kirklees, Bradford and Calderdale.
- 4.56 This site is greenfield and has a number of lower level constraints which appear to be capable of resolution. It is a high performing site in terms of the land requirement criteria and is a suitable option for release from the Green Belt for development.
- 4.57 The site is well contained by the A58, M606 and existing development, albeit that development remains in the Green Belt. Its development will reduce separation distances between Cleckheaton and Scholes, but it will not result in their coalescence or unnecessary sprawl into the countryside. The release of this land would not undermine the functioning of the wider Green Belt and, in the context of the identified need; we consider this to be a justified release of land.

North Bierley

- 4.58 This site is the subject of a current application which is due to be determined.. The proposed development focusses on employment provision and the site is very well located for access to J25 of the M62 and the M606.
- 4.59 This site has a number of lower level constraints which the planning application has demonstrated to be capable of resolution. It is a high performing site in terms of the land requirement criteria and is a suitable option for release from the Green belt for development.

- 4.60 The site is well contained by the M606 and a watercourse, albeit that development remains in the Green Belt. Its development will reduce separation distances between Cleckheaton and Oakenshaw, but it will not result in their coalescence or unnecessary sprawl into the countryside. The release of this land would not undermine the functioning of the wider Green Belt and, in the context of the identified need; we consider this to be a justified release of land.

Other Potential Sites not selected for allocation

Howden Clough Road, adjacent to Birstall Retail Park, J27 M62 (Site 1)



- 4.61 This site is approximately 17ha and is bounded by the existing Centre 27 Business Park, Norquest Business Park, Howden Clough Industrial Estate and a watercourse. It is greenfield and occupies the gap between this established industrial area and the Kirklees boundary. It is well-contained on all sides and would not reduce distances between settlements or result in future pressure to extend into the Green Belt around the site.
- 4.62 However, the site slopes steeply, is largely wooded and is crossed by overhead pylons. Access to the motorway would need to be achieved through the existing Industrial Estate, via Nab Lane, Pheasant Drive and the A62.
- 4.63 It is our view that this site is not considered to be a suitable release at this time, as the topography would offer a major barrier to development.

Whitehall Road West (A58), Hunsworth J26 M62 (Site 2)



- 4.64 This site is bounded by the M62, Whitehall Road West, woodland and existing housing areas off Hunsworth Lane. It is greenfield and approximately 19ha. It is sloping agricultural land with well-established and treed field boundaries at its southern end close to Whitehall Road West. To avoid taking access through a residential area, access would be needed directly off the A58.
- 4.65 The site would not result in a loss of separation distance between settlements and is relatively well contained by recognisable features on the ground.
- 4.66 However, the site is adjacent to approximately 74 houses on its western edge and, whilst the A58 is a major highway, traffic from the site would need to pass through Hunsworth to access the motorways. This is not considered to be ideal, especially given the existence of other sites without such a constraint.
- 4.67 This site is not considered to be suitable for release at this time.

Bradford Road / Sykes Lane, Oakenshaw, J26 M62 (Site 3)

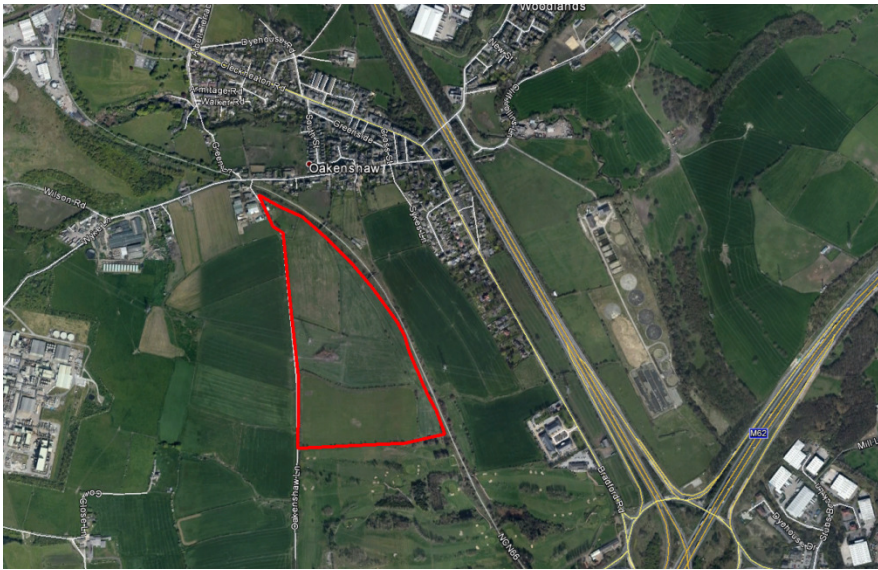


- 4.68 This site is approximately 16ha and is bounded by a disused railway embankment, houses on Bradford Road, houses on Sykes Lane and the Cleckheaton Golf Club. It is greenfield, relatively flat and well contained by existing features. It is crossed by overhead pylons.

- 4.69 Access would need to be taken either from Sykes Lane, which is narrow and shared by several dwellings, or directly from Bradford Road, close to Woodlands Park (a small office complex).

- 4.70 The site is adjacent to around 40 homes and, as such, we consider this has the potential to cause more amenity issues than other equally well located sites.

Oakenshaw Lane, Oakenshaw, J26 M62 (Site 4)



- 4.71 This site is also approximately 16ha and located immediately adjacent to site 3 above. It is greenfield and bounded by the disused railway, Oakenshaw Lane and the Cleackheaton Golf Club. It is crossed by overhead pylons. It is well contained by recognisable features and would not significantly reduce the separation between settlements in the area.
- 4.72 Access would need to be taken from Oakenshaw Lane. At its north, the Lane is shared with a farm, and crosses the railway cutting in a narrow cobbled bridge which is unlikely to be suitable for commercial traffic. At its south the lane is a dirt track directly accessing the A58. It would require major upgrading works to be used as an access point for commercial traffic and this would involve acquiring additional land along a considerable length of the Lane.
- 4.73 Achieving a suitable access to this site would be extremely difficult.

Brighouse Road, Ainley Top, J24 M62 (Site 5)



- 4.74 This site is greenfield, with an area of approximately 7ha, and is bounded by Brighouse Road, woodland and Burn Road. It is dissected by Grimescar Road and, as a result, forms a smaller triangular area and a broadly rectangular section. It slopes gently to the south. It is crossed by overhead pylons.
- 4.75 The site has good accessibility to the motorway as well as access to both Huddersfield and Halifax. It could accommodate smaller units but is unlikely to accommodate any larger scale distribution development. It is well contained and would not reduce settlement separation distances.
- 4.76 Part of the eastern area of the site slopes steeply and accommodates overhead pylons, which means that it would be difficult to re-grade without moving the pylons. The remaining area is around 5.5ha. Theoretically, at 40% site coverage, this could accommodate a building of 22,000sqm (236,800sqft), although the need to re-grade the site to achieve a level platform would be likely to reduce the developable footprint.
- 4.77 Whilst this site would be capable of contributing to supply, it is quite constrained and it is notable that other sites with similar constraints at Lindley Moor have had to rely on cross subsidisation to deliver employment space. This suggests that similar market return/cost balancing issues may well exist on this site.
- 4.78 This site is a good potential release site, although it could only accommodate either a single moderate sized unit, or a range of smaller units.

Land to the rear of New Hey Road, Mount, J23 M62 (Site 6)



- 4.79 This site is located to the rear of dwellings off New Hey Road. It would need to take access off an existing farm track, through a small gap between existing dwellings, or off Rey Gate, through an existing farm. Neither of these options is likely to deliver an acceptable standard of access.
- 4.80 The site is greenfield, approximately 11.5ha, and slopes steeply down from the houses on New Hey Road.
- 4.81 This site is not likely to be feasible to access and is also likely to have other abnormal costs associated with re-grading the site for development.

Conclusions

- 4.82 It is clear that a number of alternative sites could be brought forward to meet the need identified in the plan period. It is also clear that a number of additional sites, which have been identified as potential alternatives to those sites, do not perform better in terms of Green Belt function or have other practical delivery issues which suggest that they should not be favoured for an early release. None of these alternative sites represents a reasonable alternative to the sites proposed for allocation.
- 4.83 The analysis has also shown that there is a pipeline of good-quality committed development. However, these represent just under a year's supply of land, when the plan is already more than 3 years into its plan period. The policies in the new plan would increase the amount of land needed on an annual basis and the committed supply would only represent about a third of a year's supply.
- 4.84 The District has not seen a new supply of employment land for nearly 17 years. Whilst there is a small committed supply of good quality land, it is not adequate to meet needs until the plan is adopted and during the early stages of the plan period when other more complicated sites are seeking permission and undertaking enabling works. There is clearly a need to release more land in order to ensure that the economic objectives of

the emerging plan, Kirklees and City Region Economic Plans, are not undermined by a lack of delivery during the plan's early stages. The identified allocations offer the best options to achieve this, and as noted above, without these allocations in place, the plan will have an inadequate supply of employment land.

5. Effects of E1832c not being allocated

- 5.1 The site is around 46Ha (gross), which is approximately 27.5% of the new land proposed to be allocated in the Local Plan. It is an equivalent scale (in net terms – 35.18 Ha) to the amount of flexibility allowance built in to the plans current land supply (30% or 38 Ha).
- 5.2 The loss of this site would therefore mean the loss of nearly a third of the plans new employment land supply, and would remove any choice and flexibility from the plans land allocations. This would be significantly detrimental to the plans land supply and its objective of transforming the economic prosperity of this area.
- 5.3 The loss of E1832c would also compromise the delivery of the transport benefits associated with planned highways improvements. Without E1832c being allocated, the West Yorkshire Transport Fund outline business case for highway improvements would be weakened, and the ongoing congestion issues would be likely to continue. This would have wider disadvantages for the local community and businesses, and not be beneficial to the public interest. It would also have infrastructure implications for other key strategic Local Plan Sites within the vicinity such as H1747 and H2089.

6. Public Benefits of E1832c

6.1 The landowner considers that there are number of public benefits that weigh in favour of the allocation of the site. These relate to:

- Economic Outputs: Gross Value Added of £45.5 million over the construction period, and £102.1 million per annum once operational (within Kirklees)
- Job Growth: 2,905 (full time equivalent) jobs will be supported by the development
- Need: Meets employment land requirements established within the Local Plan
- Alternatives: Addresses a lack of suitable alternative sites
- Support: Enables expansion of niche industries and the local cluster of automotive / precision engineering businesses
- Optimum Viable Use: E1832c will help to create a more viable Kirklees Estate, which will provide the land owner with more opportunities to invest resources in other historic assets at the Estate.
- Infrastructure: Delivery of new public infrastructure in the form of major road improvements which will address long standing congestion and delay issues in Kirklees.

6.2 It is of note that the landowner is in a unique position as he controls critical land areas which can be made available for delivering mitigation and major road improvements, in addition to having control over the heritage assets of the Estate.

CONCLUSION

6.3 It is considered that clear public benefits will follow from this site being delivered, and that these outweigh the limited harm to the Green Belt and any changes to the setting of designated heritage assets.

6.4 Public benefits may follow from many developments and can be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (paragraph 7). Ensuring that sufficient land of the right type, is available in the right places, and at the right time to support growth and innovation, is a public benefit.

6.5 Although development of E1832c would affect the setting of heritage assets, it would lead to less than substantial harm to the significance of those heritage assets. This statement has demonstrated that this harm is clearly outweighed by the public benefits of this proposal.

Appendix 1: Economic Benefits Summary Statement

Economic Benefits Summary Statement

Cooper Bridge, Mirfield, Kirklees

January 2018

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Contact

Richard Laming
Richard.laming@turley.co.uk

Fiona Elton
fiona.elton@turley.co.uk

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Economic Benefits Infographic

Proposed development: Cooper Bridge, Mirfield, Kirklees

Site: 25 industrial and warehouse units (use classes B1c, B2 and B8) covering 1.5 million sq ft

Construction Phase



Significant investment of
£134.7 million
associated with the proposed
development



105 gross direct

FTE (full time equivalent) jobs supported during the construction period (assumed 10 years)

70 net direct

FTE jobs including 60 taken by residents of Kirklees

35 indirect/induced

FTE jobs including 15 taken by residents of Kirklees



£63.6 million

Total GVA¹ estimated to accrue over the construction period, including £45.5 million in Kirklees

Operational Phase



2,905 gross direct

FTE (full time equivalent) jobs supported by the development

2,070 net direct

FTE jobs including 1,635 taken by residents of Kirklees

1,035 indirect/induced

FTE jobs including 410 taken by residents of Kirklees



£155.6 million

GVA¹ output per annum including £102.1 million in Kirklees



Occupation variety

A range of managerial, professional, skilled trades and administrative jobs supported



£2.3 million

uplift
in business rate revenue per annum²

¹ GVA (Gross Value Added) measure the value of output created (i.e. turnover) net of inputs used to produce a good or service (i.e. production of outputs). It provides a key measure of economic productivity. Put simply the GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes.

² Based on evidence of current values for comparable units and uses.

Economic Benefits Summary Statement

Introduction

1. This Statement has been prepared by Turley Economics in relation to the construction of 25 industrial and warehouse units (B1c, B2 and B8 uses) covering 1.5 million sq ft (the proposed development) at Cooper Bridge, Mirfield, Kirklees (the application site).
2. The purpose of the Statement is to quantify the potential economic benefits to the local Kirkless and wider Yorkshire and Humber economies that are likely to arise from delivery of the proposed development.
3. The assessment has been undertaken in accordance with the HCA Additionality Guidanceⁱ and the HCA Employment Density Guideⁱⁱ and draws on published official data sources.
4. The following section provides an overview of the quantified economic impacts of the proposed development both during the construction phase and the subsequent operational lifetime of the proposed development once occupied.

Summary of Economic Benefits

Construction Phase

5. The following headline economic impacts are likely to be associated with the construction phase of the development:
 - **Direct Employment** - the significant investment of approximately £134.7million in the construction of the proposed development. This has the potential to support approximately 1,055 person-years of direct employment with the construction sector. This equates to an average of 105 full-time equivalent (FTE) temporary jobs annually over an estimated 10 year construction periodⁱⁱⁱ, of which it is estimated that 70 FTE jobs per annum could be sourced from the Yorkshire and the Humber regional labour force, including 60 FTE jobs per annum locally within Kirklees^{iv}.
 - **Indirect and Induced Employment** - a further annual average of 35 FTE temporary jobs would be supported within the supply chain, related businesses, and onward expenditure within the Yorkshire and the Humber economy, inclusive of 15 FTE jobs per annum in Kirklees throughout the construction period^v.
 - **Productivity** - the construction phase of the proposed development will generate a significant increase in productivity as measured by Gross Value Added (GVA)^{vi}. Put simply, GVA is the total of all revenue into businesses, which is used to fund wages, profits and taxes. The construction capital expenditure associated with the proposed development could deliver a £6.4 million net additional GVA contribution to the Yorkshire and the Humber economy each year, equating to a total of £63.6million over the estimated 10 year construction period, including a £45.5 million net additional GVA contribution to the Kirklees economy^{vii}.

Operational Phase

6. As the proposed development is completed and occupied, a subsequent round of economic benefits will be generated. These “operational phase” benefits are likely to include the following:
- **Direct Employment** – once operational, the employment floorspace is expected to support up to 2,905 gross FTE jobs on site. When allowances for leakage and displacement are made^{viii} it is estimated that approximately 2,070 FTE jobs could be contained within the Yorkshire and the Humber regional labour force, of which 1,635 FTE jobs are expected to be taken by residents of Kirklees. A range of managerial, professional, skilled trades and administrative jobs will be supported by the proposed development, providing a variety of employment opportunities in different occupations.
 - **Indirect and Induced Employment** – a further 1,035 FTE jobs would be supported within supply chain and related businesses, as well as through onward expenditure of wages within the Yorkshire and the Humber regional economy. This is inclusive of an estimated 410 FTE jobs supported in Kirklees throughout the operational lifetime of the proposed development.
 - **Productivity** – the operation of the proposed employment floorspace will generate a net additional GVA contribution of up to £155.6 million within the regional economy each year during occupation of the proposed development, including £102.1 million within Kirklees^{ix}.
 - **Business Rate Revenue** - it is estimated that the employment floorspace could generate a net uplift of approximately £2.3 million business rate revenue per annum. In future years, local authorities could retain 100% of their business rates^x. Therefore, going forward it is likely that £2.3 million in business rate revenue could be retained by Kirklees Council per annum as a result of the proposed development.

Conclusion

7. In summary, the benefits associated with approval and delivery of the proposed development on the application site will positively contribute to the local and regional economy. The construction of the proposed development will generate initial temporary direct economic benefit. This will be experience in additional jobs, a boost to supply chain industries and other industries benefiting from onward expenditure within the economy. As new floorspace is occupied by businesses this will provide permanent employment opportunities, boost productivity in the local economy and generate public revenue through additional business rates.
8. The positive economic impacts of the proposed development will therefore persist over a long period of time, providing tangible benefits for the workforce of Kirklees and the wider regional area.

ⁱ HCA (2014) Additionality Guide Fourth Edition

ⁱⁱ HCA (2015) Employment Density Guide 3rd edition

ⁱⁱⁱ HM Treasury considers that 1 permanent FTE construction job is equivalent to 10 person-years of employment. This therefore assumes a 10 year construction period as standard. In reality the volume of construction employees on site will fluctuate and will be higher if the construction period is reduced. It is assumed that the proposed development will have a 10 year construction period allowing for site preparation, infrastructure and residential development.

^{iv} Local and regional labour market containment assessed utilising evidence from the ONS 2011 Census

^v Direct, indirect and induced impacts applied utilising leakage, displacement and multiplier effects in line with HCA (2014) Additionality Guide Fourth Edition.

^{vi} GVA measures the value of output created (i.e. turnover) net of inputs purchased and used to produce a good or service (i.e. production of the output). GVA therefore provides a measure of economic productivity.

^{vii} Average GVA per FTE employee estimates within the Kirklees construction sector sourced from Experian Local Market Forecasts (December 2017) (average trend derived from 2013-17 period).

^{viii} Leakage and displacement assumptions are in line with HCA (2014) Additionality Guide Fourth Edition.

^{ix} Average GVA per FTE employee estimates within the Kirklees manufacturing and warehouse and logistics sector sourced from Experian Local Market Forecasts (December 2017) (average trend derived from 2013-17 period).

^x A system of top ups, transfers and tariffs will continue to operate to help even out inequalities between the level of business rates generated by individual Local Authorities. Therefore some authorities may not retain 100%.

Turley

1 New York Street

Manchester

M1 4HD

T 0161 233 7676