



Kirklees Local Plan Examination

Stage 4 – Other site allocations

Hearing Statement

**Submitted on behalf of Upper
Dearne Valley Environmental Trust
(registered charity number 1157540)**

**Matter 27 – Strategic employment
allocations: Green Belt releases
(E2333a – land east of Park Mill,
Wakefield Road, Clayton West)**

January 2018

Matter 27 – Strategic employment allocations: Green Belt releases

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

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

1. The Upper Dearne Valley Environmental Trust has already submitted representations against the proposed allocation of site E2333a and trust that the Inspector has these representations and will take them in to consideration. However, the Upper Dearne Valley Environmental Trust wish to make the following additional comments in relation to the specific Questions raised by the Inspector. Upper Dearne Valley Environmental Trust also wish to speak at the hearing in relation to Matter 27.

2. Introduction

2.1 Site E2333a is land to the north and south of, Wakefield Road, Clayton West, Huddersfield.

2.2 Site E2333a is currently located within the Green Belt and is currently good quality agricultural land. The Site is used for arable crops in rotation.

2.3 Site E2333a is being promoted as an employment site with 14.89 hectares of developable land being promoted for commercial use within the Kirklees Publication Local Plan.

3. Question (a)

3.1 The UDVET are unclear on what employment uses are being suggested for this site.

3.2 The site promoters seem to present contradictory arguments. Their overall argument is that there's a shortage of large sites for big operators. Then they say that the site would be 'appropriate for smaller scale B8 occupiers and B2 operators'¹

3.3 The Site promoter then admit² that the site is unsuitable for large scale distribution operators, B8, owing to distance from motorway (topography between the site and the motorway junctions seems to be forgotten). The promoters then argue *'that in order to establish itself it will be necessary for the industrial units at the business park to have a hybrid B2 and B8 use classification in order to attract as many occupiers as possible'*³

¹ Quod Statement in response to Stage 3 MIQs, Section 3.1

² Quod Statement in response the Stage 3 MIQs, Section 3.1

³ Above document, Section 3.4

- 3.4 We are therefore justifiably confused about what employment uses would be supported on this site. Without knowing this it is impossible to reach a conclusion on whether the proposed level of floor space is justified or deliverable.
- 3.5 The promoters have stated that 'it is very difficult to quantify the level of latent demand which might be attracted to the site'⁴ However, they then go on to say their analysis has demonstrated 'sufficient latent demand in the market'.⁵ Arguments switch wildly from regional/sub-regional level to local level. The promoters claim the business park is a 'viable option for national and regional occupiers' but this is quite against the analysis in the Growth Delivery Statement
- 3.6 The promoter of the site is contradictory on level of demand – is it 6 companies or 5 companies? Different figures are quoted throughout the document. We understand that Wellhouse Leisure moved to Skelmanthorpe Technology Park over a year ago, Wesco Aircraft have already moved and Phoenix Textiles have no intention of moving and are investing in their current site. This leaves just 55,000 sq. ft. not 250,000 sq. ft of purportedly identified local requirement. This could easily be accommodated on Site H3325a if it was retained for employment purposes, 100,000 sq ft available if Adare moved. In addition, we understand 2 Directors of the CWDC have resigned and transferred their business interests to industrial sites down the M1 in South Yorkshire.
- 3.7 The site promoters have only reported on commercial property types and availability within Clayton West village (this is not a town as claimed in the promoters statement). This fails to consider all availability in the surrounding villages of Scissett, Denby Dale and Skelmanthorpe. The UDVT has done an assessment of available commercial floor space within the area and this clearly demonstrates that there is an abundance of available commercial floor space. An up to date list will be presented at the hearing.
- 3.8 The indicative floor space capacity is not proven as deliverable, indeed all is very uncertain by the site promoters own admission.
- 3.9 The demand for employment land in this location is not there. The site is in severe competition against other emerging industrial sites alongside the M1 in both West and South Yorkshire with far better and immediate access to M1, particularly the Dearne Valley Way site close to the new proposed Transpennine road/tunnel which is currently anticipated to run from around Jct.36 of the M1, utilising part of the existing Stocksbridge bypass.

4. Question (b)

- 4.1 UDVT considers that The Leeds City Region Strategic Economic Plan and the Kirklees Economic Strategy are long on aspirations but short on means of achievement. Furthermore, there is a reliance on European funding for the furtherance of some of the ideas contained within these documents. The impact of Brexit is not mentioned in the documents but the drying up of European

⁴ Above document, Section 3.3

⁵ Above document, Section 3.3

money may well have a significant impact on some of the strategic schemes which are proposed.

- 4.2 The Leeds City Region has a vision “to be a globally recognised economy where good growth delivers high levels of prosperity, jobs and quality of life for everyone”. In achieving this vision, the City region will unlock its full economic potential and cement its place as an engine for growth in the North and for the North and for the nation as a whole.
- 4.3 We understand that the way that this is going to be achieved is through the development of Enterprise Zones, the Aire Valley (Leeds) and the M62 corridor.
- 4.4 We do not consider that the delivery of site E2333a would deliver the Leeds City Region vision nor the Kirklees Economic Strategy in the most effective way. There are better options which need to be explored more fully by the Council before releasing this unsustainable green belt site.

5. Question (c)

- 5.1 UDVET are unaware of why the site was selected and how the boundaries have been determined. We are of the opinion that it has been selected and set based purely on submissions made by the promoter to get this site released from the Green Belt. We have grave concerns that the future for this site if released from Green Belt will be a housing site given the lack of need and the flexible approach taken by the Council when applications for housing on employment sites are submitted.

6. Question (d)

- 6.1 The UDVET does not consider that heritage assets have been adequately assessed and addressed. The Heritage Impact Assessment has been carried out on behalf the site promoter, not by an independent Heritage body as such UDVET have little confidence in its reliability and validity.
- 6.2 We understand the buildings will be visible from a preserved heritage area and indeed the northern boundary of the extended site desired by the promoter would in fact come right to the boundary of this heritage area.

7. Question (e)

- 7.1 There is some indication of a buffer zone along the edge of the River Dearne. However, the exact area/extent is not specifically reported. The area indicated would appear to be inadequate – the entire lower area to the east of the A636 becomes waterlogged as well as flooded throughout the Autumn and Winter and after heavy rain in the Summer. The water table is naturally high. This factor was the reason the Emley Show was moved to its current location. Farming activities can accommodate land with these characteristics whereas development will not.

- 7.2 In addition, the fields to the west of the A636 appear to contain springs which bubble up after heavy rain and drain downwards towards the A636, water building up behind dry stone walls, draining over the road and down the steep drop to the land to the east. About 3 years ago the A636 had to be closed because of flooding resulting from water draining from the fields on the western side of the proposed site.
- 7.3 The 3 small ponds shown on suggested site plans appear to be totally inadequate to cope with the size and scale of the problem.
- 7.4 We are not aware of any heritage buffer zone and this is necessary.
- 7.5 Therefore, we do not believe that the Plan provides sufficient details regarding the location and extent of any undevelopable areas or buffers zones. This is wholly unacceptable.

8. Question (f)

- 8.1 The UDVET does not consider that constraints such as highways, flood risk, landscaping, drainage and power lines are fully identified within the Plan.
- 8.2 The Plan fails to mention the restraints apparent with the A636 which is a single carriageway road, heavily congested at peak times and traffic often queues. Traffic generally starts to build from 3pm each weekday afternoon.
- 8.3 The Council also fails to mention that this site has no electricity supply suitable for industry and power will need to be brought 5/6Km from Grange Moor. This will be a major and expensive undertaking (assuming landowner permission can be gained) and, in itself, a major barrier to development and deliverability.
- 8.4 Part of site E2333a is located within flood zone 3. Part of the Site serves as a flood plain for the River Dearne. The whole of the area suffers from surface water flooding and the site has been waterlogged during the recent bad weather. We consider that there are significant flooding and drainage issues which need to be fully addressed prior to this site being taking forward.
- 8.5 In addition we understand that there are available sites within Flood Zone 1 and these should be considered ahead of this site.
- 8.6 We cannot see any details of mitigation measures within Part 2 of the Plan. The Plan simply lists reports which will be required. However, specific mitigation measures need to be identified and considered.

9. Question (g)

- 9.1 Paragraph 80 of the NPPF confirms that the green belt serves five purposes which are:
- “● to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;

- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

9.2 This area of Green Belt keeps in check the unrestricted sprawl of Clayton West.

9.3 This area of Green Belt prevents the merger of Clayton West, Bretton and Emley and maintains the ‘green corridor’ designated by Natural England.

9.4 This area of Green Belt also safeguards the countryside from encroachment.

9.5 Site E2333a serves Green Belt purposes and continues to serve a purpose as Green Belt land and should be protected as Green Belt land in accordance with the NPPF

9.6 Paragraph 82 of the NPPF confirms that:

“The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:

- demonstrate why normal planning and development management policies would not be adequate;
- set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;
- show what the consequences of the proposal would be for sustainable development;
- demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and
- show how the Green Belt would meet the other objectives of the Framework.”

9.7 Site E2333a is within the Green Belt and would be removed from the Green Belt if this allocations were taken forward. The Council have failed to show any exceptional circumstances for removing this site from the Green Belt. Indeed they have already accepted that they are providing an oversupply of employment land. Therefore, we can see no exceptional circumstances which justify the removal of this Green Belt site for employment uses.

9.8 The Council have not sufficiently demonstrated why the land should be removed from the Green Belt in accordance with the requirements set out within paragraph 82 of the NPPF.

9.9 Site E2333a is part of the green corridor leading to the Dearne and Holme valleys. If the Site were allocated for development this green corridor would be ruined. Development of site E2333a would also destroy the view from the Yorkshire Sculpture Park, and be a disincentive to the growing tourist trade. This is contrary to the NPPF.

10. Question (h)

10.1 UDVET do not consider that the proposal for site E2333a is viable or deliverable.

10.2 UDVET believe that any demand which exists can be met by retaining the employment status of site H3325a rather than allowing this employment site to be reallocated for housing.

10.3 UDVET have not seen information on the timescales for deliver and any phasing implications on the strategic road network and funding. In fact we are not aware of any improvements being provided to the strategic road network to serve this proposed allocation?