

STATEMENT IN RESPONSE TO INSPECTOR'S MATTERS, ISSUES AND QUESTIONS TO THE EXAMINATION OF THE KIRKLEES LOCAL PLAN

MATTER 27 – STRATEGIC EMPLOYMENT ALLOCATIONS

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1 Introduction

- 1.1 This Statement is submitted on behalf of Clayton West Development Company Limited ("CWDCL").
- 1.2 CWDCL have a development option on 25.7ha of land to the north and south of Wakefield Road, Clayton West. This is shown on the Plan at **Appendix 1**. This land is referred to throughout this Statement as the "CWDCL Land".
- 1.3 CWDCL have made representations to the Kirklees Local Plan ("KLP") at each stage of its preparation and have also submitted additional information in response to specific matters raised by the Council's landscape architect and questions from Historic England.
- 1.4 CWDCL's representations and the additional information submitted show that it is wholly appropriate and necessary to allocate the full extent of the CWDCL Land for employment development in the KLP.
- 1.5 The Council propose to allocate only part of the CWDCL Land for employment development in the KLP, via Policy E2333a. The extent of the proposed allocation is shown on the Plan included at **Appendix 2**.
- 1.6 This Statement demonstrates that, whilst CWDCL support the KLP and the proposed allocation E2333a for employment uses, it is both appropriate and necessary to allocate the entirety of the CWDCL for development over the Plan Period to meet the objectively assessed economic needs of the Borough in full. CWDCL therefore invites the Inspector to consider the appropriateness of extending the Council's proposed allocation through her Examination of the Plan.
- 1.7 This Statement goes on to deal with the specific issues raised by the Inspector under Matter 27, which considers the strategic employment allocations proposed by the Council.

2 Matter 27

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

Type of Employment Uses

- 2.1 As with all of the other employment allocations in the KLP, the CWDCL Land is allocated for employment generating uses.
- 2.2 The Council intends to add a definition of "employment" into the KLP's Glossary. This will confirm that employment generating uses include those falling within Class B of the Use Class Order, as well as a range of other uses which generate significant levels of jobs.
- 2.3 Prime employments sites, such as E2333a, have been allocated primarily to accommodate B1c/B2 and B8 uses, though there may be an element of ancillary B1a office accommodation and research and development delivered as part of any phase of development and other supporting/ancillary uses may also be appropriate as part of the wider use of the site(s).
- 2.4 The employment uses which can come forward on allocated sites are therefore not unduly restricted by the wording of the KLP's policies. This is an approach which is supported by CWDCL and fully accords with the NPPF (Paragraph 21), which requires policies to be "flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances".

Indicative Floorspace Justification

- 2.5 To support the preparation of the KLP, the Council has undertaken an objective assessment of employment needs over the Plan Period. The Inspector considered this approach during Stage 1 of the Examination.
- 2.6 In accordance with the PPG, the Council considered future quantitative and qualitative needs for new development that could be reasonably expected to occur (Paragraph: 002 Reference ID: 2a-002-20140316).
- 2.7 In order to align with and enable the delivery of both Leeds City Region Strategic Economic Plan ("SEP") and the Council's own economic objectives (which are set out in the Kirklees Economic Strategy ("KES")), the Council has identified an objectively assessed need of approximately 23,200 full time equivalent jobs. CWDCL support this jobs growth target.
- 2.8 The Council has translated this into a land requirement of 175 hectares using job density assumptions contained within the Roger Tym April 2010 "Planning for Employment Land, Translating Jobs into Land" study ("the RTR"). The density figures have then been applied to the jobs growth per sector, set out within the KES.
- 2.9 CWDCL consider that the floorspace target is fully justified.

Indicative Floorspace Delivery

2.10 The KES aims to achieve economic growth through, in particular, increasing the scale of the engineering and manufacturing sector. CWDCL support the Council's strategy to build on this well-established sector of the market. Based on market advice from JLL (Appendix 3) (which demonstrates significant market demand for employment land and premises to accommodate manufacturing and engineering uses), CWDCL consider that it is achievable over the plan period.

- 2.11 However, CWDCL consider that the job density assumptions used by the Council are overly optimistic and further land may be required in order to achieve their economic objectives. This is particularly the case at the CWDCL Land.
- 2.12 The RTR makes clear that, wherever possible, "authorities should avoid blanket assumptions about plot ratios" (Paragraph 7.1), with floorspace targets being the main "yardstick" being used in planning policies.
- 2.13 CWDCL consider that the RTR plot ratio assumptions are unrealistic at the CWDCL Land due to the nature of the site, particularly due to its topography; the need to ensure that Green Belt boundaries (once redrawn) are appropriate, defensible and longstanding; and the proposal to incorporate high quality landscape mitigation.
- 2.14 CWDCL have reached this conclusion on the basis of their own feasibility work (**Appendix 4**). This demonstrates that a maximum development density of 3,200 sq m/ha (of the net developable area) would be achievable at the site and that net developable area of the intended allocation is between circa 10.1ha and 11.3ha. As such, the proposed allocation is only likely to deliver in the order of 35,100 37,250 sq.m of commercial floorspace (which is potentially some 23,894 sq.m (up to 41%) less than the amount which the Council has identified as being both acceptable and necessary at this site).

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

- 2.15 There are three distinct Functional Economic Areas ("FEAs") in the Borough: Huddersfield, North Kirklees and South Kirklees. These are defined by a range of differing physical and socio-demographic characteristics. The CWDCL Land is located within the South Kirklees FEA.
- 2.16 The South Kirklees area is considered the most "rural", with a more limited workforce catchment. The area has typically catered for more local demand and smaller scale business and operational requirements when compared to the northern parts of the Borough.
- 2.17 There is also an identifiable need to address high levels of out commuting that are experienced throughout Rural Kirklees (and particularly in Clayton West) in order to help create more sustainable communities and patterns of travel.
- 2.18 However, parts of South Kirklees (in particular Clayton West) can be differentiated from much of the rest of the FEA as a result of their relationship with key transport corridors, including the M1 in particular.
- 2.19 There is limited available employment land stock in South Kirklees (16,400sqm) and the supply of employment land is also highly limited (in the order of 8.28ha, split across 20 small scale employment land commitments).
- 2.20 The housing and spatial development strategy (set out on Page 36 of the KLP) therefore identifies the intention for prime new employment development to be located along the M62 corridor to the north of Kirklees and in the Dearne Valley, where easier access can be achieved to the M1.
- 2.21 27ha of new employment land is therefore proposed to be allocated in South Kirklees. This accords with the objectives of the local and sub-regional economic strategy, though may not deliver the scale of jobs growth anticipated for the reasons set out above.

C - How was the site selected and its boundaries determined?

Site Selection

- 2.22 The CWDCL allocation is (along with all other allocations) market derived, i.e. underpinning the KLP is an assessment of the development potential of those sites put forward for allocation through Call for Sites exercises and their capability or otherwise to meet in full, the Council's employment land requirement.
- 2.23 Land requirements vary over different sectors of the economy. The type of land made available (including potential plot sizes), as well as its geographical location (in terms of, inter alia, its relationship with the workforce, key infrastructure and existing employment areas) is of critical importance to meeting the need.
- 2.24 In this case, the KLP proposes allocations to accommodate prime new employment development along the M62 corridor to the north of Kirklees and in the Dearne Valley, where easier access can be achieved to the M1 (which is critical for many "footloose" commercial occupiers which the Council wish to locate within the Borough).
- 2.25 Local employment needs are then met in the main urban areas and smaller settlements through a combination of smaller employment allocations and Priority Employment Areas.

Boundary Location

- 2.26 CWDCL supports allocation E2333a but considers its extent should be substantially increased.
- 2.27 As set out above, the Council's development density assumptions are unrealistic and the proposed allocation will not accommodate the amount of development that is both necessary and justified in this location to realise the Council's economic aspirations.
- 2.28 A larger allocation would enable a greater degree of mitigation to be provided on site, whilst creating a strong and defensible Green Belt boundary.

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

- 2.29 Smeeden Foreman ("SF") assessed the potential impact of development (on both the CWDCL Land and the proposed allocation) on the Grade II Parkland Landscape of Bretton Hall ("the RPG") and the Scheduled Ancient Monument of Bentley Grange to the north east of the site (Appendix 5).
- 2.30 The assessment showed that the RPG is well contained by woodland and undulating land form which means views of the CWDCL Land are limited to elevated westerly sections, where only distant and intermittent views can be gained.
- 2.31 Development of the CWDCL Land was therefore not considered to have any material impact on the character of the RPG or its setting. It was also concluded that the introduction of additional landscaping of the kind that could be created through the allocation of the CWDCL Land in full will only help to further screen development.
- 2.32 Views of the site from Bentley Grange are similarly obscured by topography and intervening landscape such that the allocation of the CWDCL Land would have no material impact upon the character or setting of the site.

- 2.33 Historic England have, however, noted a potential for impact on the setting of the RPG from a number of viewpoints.
- 2.34 SF initially undertook further work which considered the visibility of the site from the viewpoints which were of concern to Historic England (this is incorporated in the version of the Landscape Statement included at **Appendix 5**). CWDCL have then gone on to consider how these viewpoints contribute to the asset's significance.
- 2.35 The Heritage Appraisal (**Appendix 6**) demonstrates that the grounds of "the RPG" were principally designed for internal appreciation, with no evidence of designed views towards the surrounding landscape setting. Views of the landscape setting of the asset are therefore incidental and do not make any significant contribution towards its significance.
- 2.36 The CWDCL Land (and proposed allocation) are distant from the RPG and neither are visible from the majority of viewpoints within it due to existing landscape features and topography. Through appropriate development management, it would be possible to reduce the visibility of any development further still.
- 2.37 On the basis of these factors, the Heritage Appraisal confirms that the allocation of the CWDCL Land in full (or as proposed by the Council) will not harm the significance of the RPG.

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?

Effect on Green Belt

- 2.38 A landscape character and visual appraisal of the CWDCL Land and its surroundings has been undertaken (Appendix 5) to understand the impact of development of the CWDCL Land (and the proposed allocation) on the visual amenity and the landscape character of the area. A comparative analysis of the impact of development across the whole of the CWDCL Land versus the proposed allocation area is included as part of the assessment.
- 2.39 Whilst the agricultural character is noted, the area is already characterised by built form within Scissett and Clayton West and in this context development would not be alien.
- 2.40 Due to the screening provided by the existing topography, vegetation and built form within Clayton West, the Site has good screening from the west. Visibility of the proposed allocation and the wider CWDCL Land is limited from the principle residential areas of Clayton West, with views being obscured or filtered.
- 2.41 Key receptors will be those using the Rights of Way around the Site. However development within these views will not be seen as a new element in the character of the landscape given the presence of the existing commercial buildings to the Site's south west and the village beyond and will not detrimentally affect the user experience of these routes.
- 2.42 SF has confirmed that commercial development could take place on the CWDCL Land in such a way that the magnitude of change would be low or negligible.

- 2.43 It is noted that in some cases, SF's assessment demonstrates that development of the CWDCL Land in full rather than limiting development to the area of the proposed allocation would result in minor beneficial impacts. In particular, the potential to incorporate landscape buffers within the site along its northern boundary would further assist in the development's assimilation into the surrounding landscape.
- 2.44 SF have gone on to assess the northern boundary of the Council's proposed allocation against the relevant Green Belt tests at Paragraph 85 of the NPPF.
- 2.45 Whilst CWDCL supports proposed allocation E2333a and consider that development within it would not have any unacceptable effects on the purposes of the retained Green Belt, they consider that there is a strong case for the extension of the proposed allocation on the basis of it providing a stronger, more readily recognisable and defensible Green Belt boundary.
- 2.46 The northern boundary of the CWDCL Land is marked by easily read features present on the ground, including the Public Right of Way, a tarmac drive and overhead power lines. 75m (approximately 30%) of the Council's proposed boundary would not follow any existing feature on the ground. Where features do exist, they are not as strong or defensible as those along the northern boundary of the CWDCL Land, being limited to hedgerow.

Exceptional Circumstances

- 2.47 The Council's assessment of the existing supply of employment land within urban areas has identified that it will not meet the evidenced market demands for prime employment sites which are appropriately located and of sufficient scale to accommodate the needs of the target growth sectors, both qualitatively and quantitatively, in full.
- 2.48 This is in the context of policies protecting open land within the urban areas which is considered valuable (Urban Green Space), and that no part of the requirement is being exported to neighbouring authorities.
- 2.49 In the case of meeting employment needs, exceptional circumstances have therefore been proven by the Council.

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?

Viability and Deliverability

- 2.50 The CWDCL Land is being promoted by the CWDCL who has sole control of the Site and its road frontage.
- 2.51 The Site's single ownership and its market attractiveness (as detailed in the Market Evidence (**Appendix 3**)) makes it a deliverable and viable development option, capable of being brought forward within the Plan Period. Furthermore, there are no known complications that will prevent the early delivery of the Site.
- 2.52 A financial appraisal has been undertaken for both the Council's proposed allocation and the allocation of the CWDCL Land in full based upon current market circumstances and information presently available to CWDCL. The appraisal assumes the delivery of the Council's proposal for 52,115 sq m of employment floorspace in an appropriate manner taking account of:
 - the need for cut and fill to deliver the necessary development plateaux;

- strategic landscaping along existing defined boundaries to deliver a defensible limit to the Green Belt;
- offsetting development from areas at risk of flooding;
- site access; and
- Infrastructure costs including utility diversions and connections.
- 2.53 The appraisal has demonstrated that both the Council's proposed allocation and the larger site being promoted by CWDCL are viable.

Timescales

- 2.54 CWDCL are committed to delivering employment development at the site early in the Plan Period to meet known market demands. There are 4 live enquiries at the site from occupiers who would propose to bring forward a mix of B Class Uses in units ranging from circa 4,600 sq.m to 11,200 sq.m.
- 2.55 It is CWDCL's intention to submit a planning application for the whole of the allocation shortly after its allocation is confirmed and the KLP has been adopted by the Council.

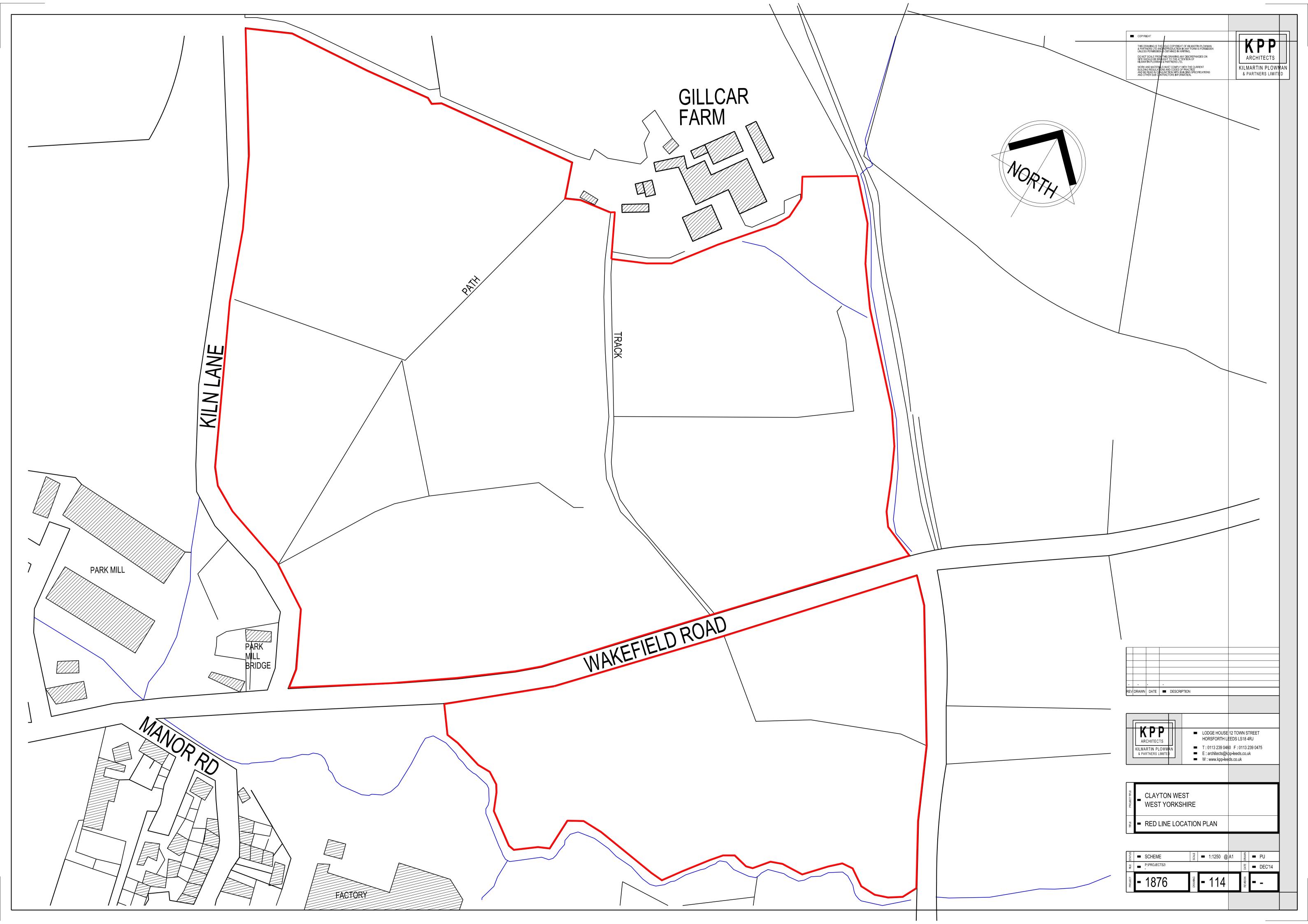
Phasing Implications

2.56 The transport work previously prepared to support the allocation of the CWDCL Land has indicated that a proportion of the development traffic generation will impact on the Strategic Road Network to the north, at J38 of the M1 Motorway. The Council has agreed with Highways England that the impacts will be capable of mitigation and they are unlikely to have any phasing or funding implications.



APPENDIX 1

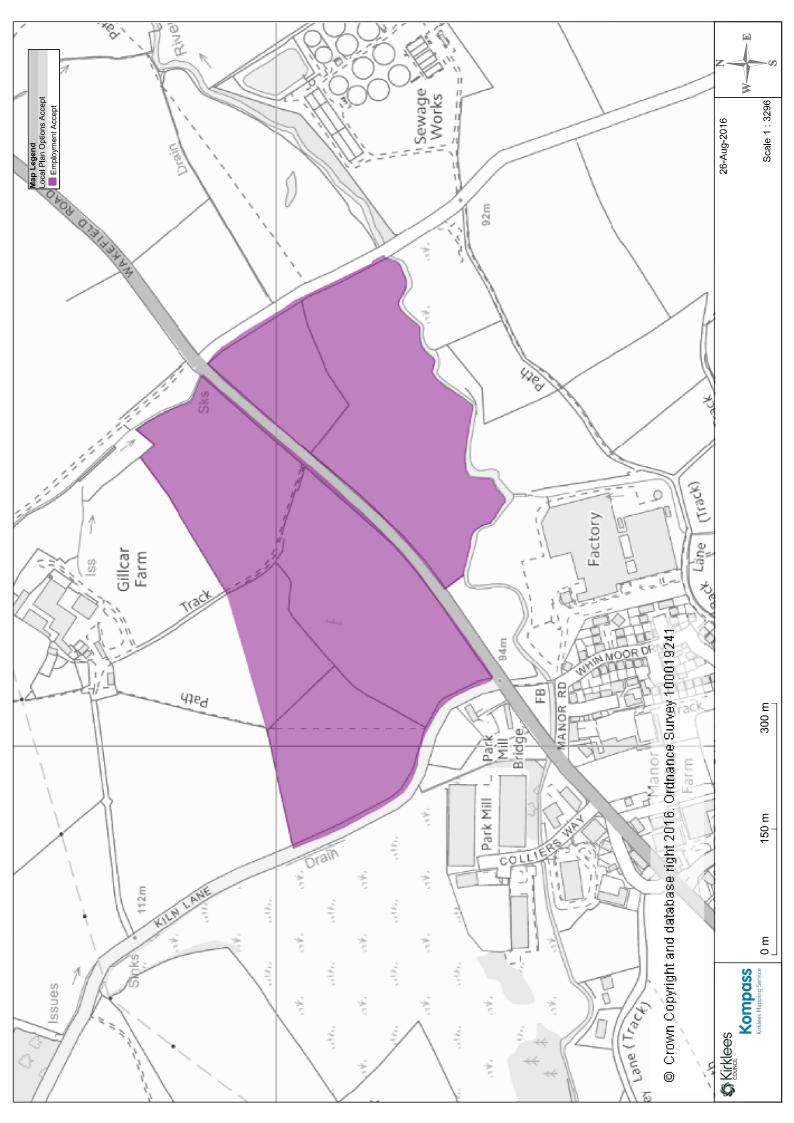
CWDCL LAND





APPENDIX 2

REVISED SITE ALLOCATION BOUNDARY E2333A





APPENDIX 3

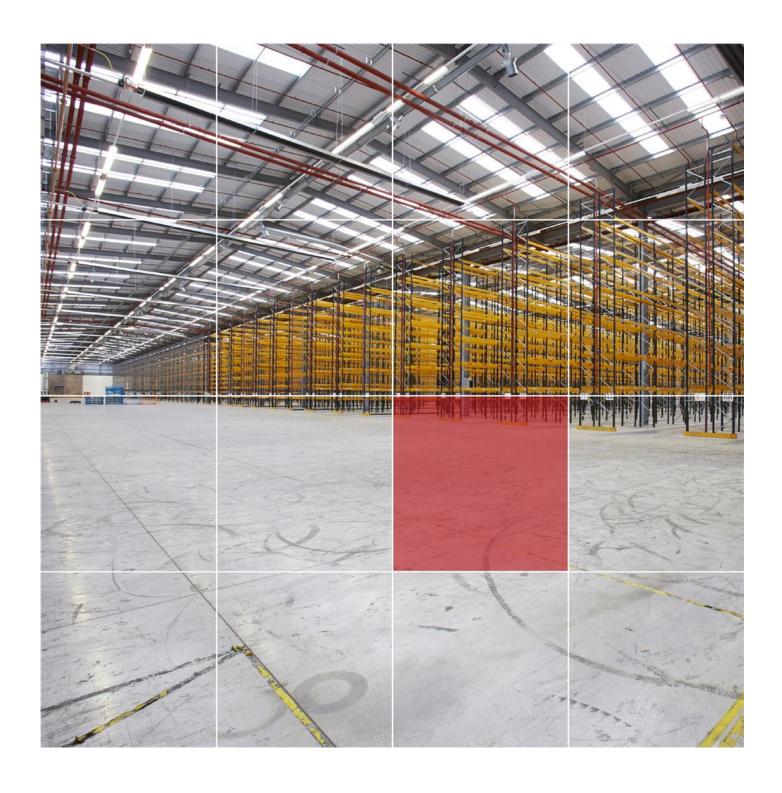
MARKET REPORT

Development Consulting

Clayton West Development Company Ltd Market Assessment - Land to the North and South of Wakefield Road, Clayton West

December 2016





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1 Introduction

1.1 Purpose of Report

This report has been prepared for Clayton West Development Company Ltd (CWDCL), who are promoting the subject site for employment development through the Kirklees Local Plan. The subject site comprises a large parcel of land at the north eastern edge of Clayton West within the Borough of Kirklees as shown on the plan below.

The Publication Draft of the Kirklees Local Plan (November 2016) proposes that only part of the site be allocated for employment use. This report reviews the need for the whole site to be allocated for employment use within the Local Plan and the potential consequences should the whole of the site not be allocated.

This report also reviews the current and historic market trends, along with the future need for employment development at the site along with highlighting the locational benefits to provide the appropriate type and amount of floorspace which could be accommodated at the site.

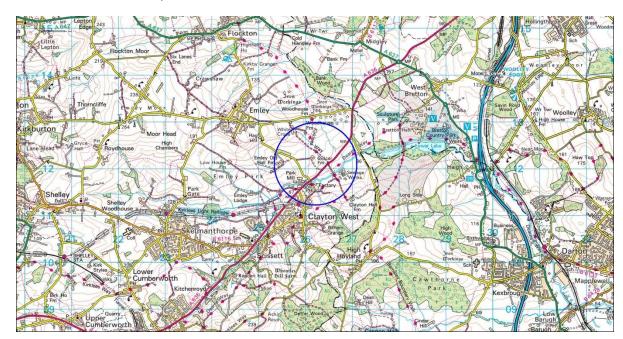
1.2 Site Overview

The subject site currently comprises agricultural land within the Green Belt. The site is split north and south of the A636 (Wakefield Road). It has been identified by Kirklees Council (the Council) as a site that is appropriate for employment development to meet the Borough's economic needs and as such it is proposed in a large part to be removed from the Green Belt.

The site which lies to the north of Wakefield Road slopes from north to south. The site which lies to the south of Wakefield Road also slopes from north to south.

The site's boundaries are well defined. Kiln Lane and an existing tree line forms the western boundary, agricultural fields form the northern boundary, existing footpath leading from Wakefield Road form the eastern boundary and the River Dearne and tree line form the southern boundary.

The site is identified on the plan below.



2 Market Assessment

2.1 National and Regional Overview

2.1.1 Industrial

UK economic growth slowed to 2.2% in 2015 compared with 2.6% in 2014, which was the strongest annual rate since 2007. Latest independent forecasts indicate that the economy is expected to grow at a similar rate in 2016 and 2017 – suggesting a steady growth outlook.

Whilst economic growth has been steady a lower level of take-up was recorded in 2015 compared with 2014. Total industrial take-up (all units sizes from 1,000 sq ft upwards) was 89.3 million sq ft last year, 11% down on 2014. The fall in demand was mostly due to reduced activity in the big box market (units of 100,000 sq ft and over), where take-up fell 22%. The take-up of small and medium-sized units between 1,000 sq ft to 99,999 sq ft was 5% down on 2014.

Regionally, industrial take-up across Yorkshire & Humberside totalled around 8.8 million sq ft in 2015. Take-up involving units from 1,000 sq ft to 99,999 sq ft totalled 5.9 million sq ft. Take-up involving large units of 100,000 sq ft and over totalled 2.9 million sq ft.

At the end of December 2015, there was some 23.6 million sq ft of industrial floorspace available across the Yorkshire and Humberside market, 18% down on the end of December 2014. Availability in Yorkshire and Humberside accounted for 11.9% of the GB total.

The available supply in units below 100,000 sq ft totalled 15.8 million sq ft, 20% lower than at the end of December 2014. Around 9% of the available floorspace in this size band comprised new or refurbished floorspace, matching the GB average.

At the end of December 2015, availability in units of 1,000 to 99,999 sq ft represented around two and a half years of supply compared with the annual average take-up rate over the past five years (2011 – 2015).

Whilst data for the year 2016 is not yet available it is expected to reveal another strong year in terms of take up and a subsequent contraction in supply. However JLL are aware of a number of speculative schemes which are currently being developed within the region where developers have cited a lack of good quality stock constricting the market.

2.1.2 Offices

The Yorkshire office market experienced a subdued start to 2016 with take-up for the first six months of the year standing at 194,830 sq ft and someway off being on target for the 10-year annual average of 498,000 sq ft. While the market was less active in the run up to the EU referendum early indications are that the market fundamentals of Leeds remain strong, with a number of corporates and the government progressing with significant office space requirements. Alongside relatively limited quality supply, this will continue to underpin market stability and confidence levels.

Supply levels currently remain constrained and the overall vacancy rate moved in to 4.1% during Q2. The scarcity of Grade A space will be addressed in Q3 when three new build schemes complete (some of which are already part pre-let). Beyond 2016 there are no major new build schemes on site in the city centre and

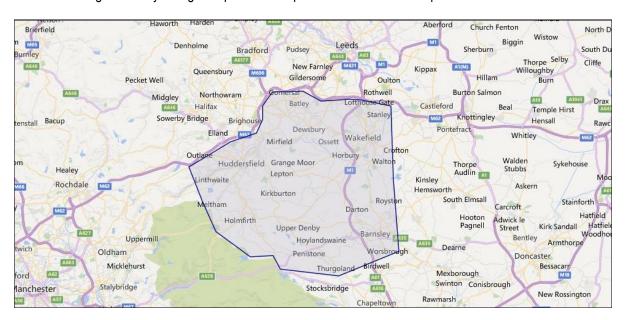
developers are currently exercising caution so occupiers requiring Grade A space into 2017 may need to pursue the pre-let route unless this is addressed.

Headline prime rents remained unchanged at £27.00 per sq ft during Q2 2016. The new high quality space coming to the market should support headline rents.

In line with some other markets, investment activity was relatively subdued in Q2 as the EU referendum came into sight. The largest transaction was Leeds City Council's purchase of 3 Sovereign Square for £43.75m reflecting 5.40% net initial yield. The mid 2016 total stands at £99m with a further circa £15m under offer. Prime yields were unchanged over the quarter and remained at 5.25% but are expected to soften during H2 2016.

2.2 Sub-Regional Market Trends

This section of the report outlines the historical and current market trends within a regional search area which is considered to provide competition to any stock developed at Clayton West. Whilst this search area is larger than the identified 'South Kirklees Functional Market Economic Area' and the wider Kirklees region, the search area contained in the map below has been derived through discussions with agents who are active within the area. It is considered that if an occupier publishes a requirement for the Kirklees area then the occupier would consider locating within any new good specification space as shown on the map below.



Based on the identified search area a supply and demand analysis has been undertaken to analyse the employment stock which will provide competition to any employment scheme which is developed at the subject site.

¹ Kirklees Employment Market Strength Assessment, GVA, September 2015.

2.2.1 Sub-Regional Supply

Existing industrial property currently available for sale or to let in the identified sub-regional search area totals 278,000 sq m (2.99 million sq ft) according to Co-Star. A breakdown of the current supply is provided in the chart below.

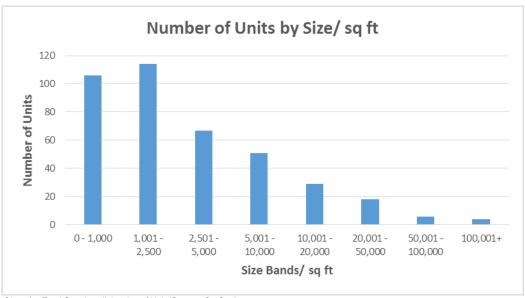


Chart 1 - Total Supply split by size of Unit (Source: Co-Star)

Chart 1 shows that there is currently available industrial supply across all the size increments, however, the highest number of vacant units is in the 93 sq m (1,001 sq ft) to 232 sq m (2,500 sq ft) category with 114 units currently available. The next highest is the zero sq m (zero sq ft) to 92.9 sq m (1,000 sq ft) category, which has 106 units currently available. It should be noted that whilst there seems to be a high number of units under 465 sq m (5,000 sq ft) currently available, they provide a mixed quality of accommodation with the majority providing dated, poor quality accommodation.

In terms of the breakdown of units below 929.03 sq m (10,000 sq ft) category there are a total of 338 units currently available in the search area. The breakdown of these is as follows:

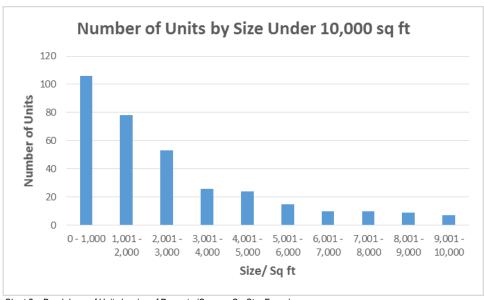


Chart 2 - Breakdown of Units by size of Property (Source: Co-Star Focus)

As can be seen from Chart 2, 54% (184 units) of units are currently available in the zero sq m (zero sq ft) to 185.89 sq m (2,000 sq ft) category. The next highest is 16% (53 units) which are currently available in the 185.89 sq m (2,001 sq ft) to 278.70 sq m (3,000 sq ft) size band.

The existing level of supply within the identified search area is 278,000 sq m (2.99 million sq ft). The majority of space is provided in the sub 929.03 sq m (10,000 sq ft) with a total of 338 units (86%) currently available, however the majority is provided in dated poor quality accommodation.

2.2.2 Sub-Regional Demand

In terms of the take up of commercial floorspace, over the five year period 2011 - 2015, in the identified subregional search area this is summarised in the chart below. It can be seen that the largest take up was in 2014, where over 90,500 sq m (974,000 sq ft) of deals were agreed for commercial space in the search area. Take up in 2013 was circa 89,900 sq m (968,000 sq ft)².

It is interesting to note that the search has revealed no take up of existing stock, office or industrial, in Clayton West over the five year period.

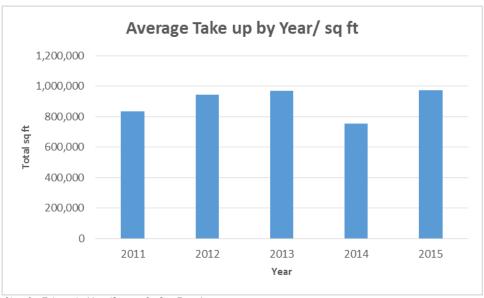


Chart 3 - Take up by Year (Source: Co-Star Focus)

Total take up in the identified sub-regional area over the five year period is 416,000 sq m (4.48 million sq ft) this equates to an average of 83,100 sq m (895,000 sq ft) per annum. If take up continued at this level then the current supply of existing stock currently available on the market would all be taken in just over three years.

Chart 4, overleaf, shows the number of transactions per year over the previous five years within the identified sub-regional area. It shows that the number of transactions have remained fairly constant throughout the period with an average of circa 120 transactions per annum. The year 2012 saw the lowest number of transactions with just 102.

² Please note that this figure is different from that previously provided during the last submission. The Co-Star database was updated in Summer 2016 meaning that the figures have been updated since the last report was provided.

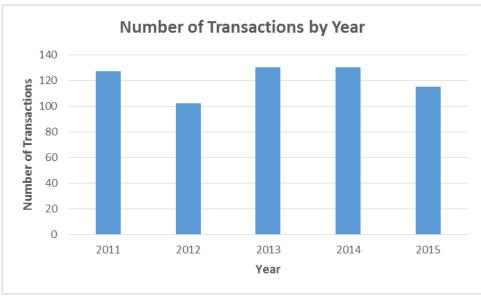


Chart 4 – Number of Transactions per Year (Source: Co-Star Focus)

2.2.3 Sub-Regional Conclusion

The above analysis has shown that there is currently 278,000 sq m (2.99 million sq ft) of available stock within the identified sub-regional search area split across 395 different units. The majority, 338 units, provide below 929 sq m (10,000 sq ft) of accommodation, the majority of which is dated stock.

A review of the demand in the sub-regional area over the five year period from 2011-2015 established that the average take up was 83,100 sq m (895,000 sq ft) per annum. If this average take up level continued then the existing stock would be taken up in just over three years.

Whilst the majority of transactions are for space below 929.03 sq m (10,000 sq ft), there has also been demand for space across all size categories.

2.3 Kirklees Region

2.3.1 Employment Land

There is a total of 59,000 sq m (640,000 sq ft) of employment floorspace currently available in the Kirklees region³. In terms of the size split of floorspace and the grade of the floorspace this mirrors that which is provided in the wider sub-region with the majority of space being provided in the 93 sq m (1,001 sq ft) to 232 sq m (2,500 sq ft) category and the majority of space available is lower grade dated poor quality accommodation.

In terms of employment land which is in the pipeline, according to the Employment Needs Assessment Technical Paper dated November 2016 there is a total of 107.24 hectares (265 acres) which has been earmarked for development within Kirklees. Of this, 84.27 hectares (208 acres) are readily available for development with a further 20.84 hectares (51 acres) committed. The report splits the different areas of Kirklees into different functional market economic areas (FEA) of Huddersfield, North Kirklees and South Kirklees. The Employment Needs Assessment Technical Paper also provides a breakdown of the allocated current employment land supply across these different Kirklees FEAs. There is a total current employment land supply of 61.58 hectares (152 acres) in the Huddersfield functional market economic area, a total of 33.83 hectares (84)

³ Co-Star online availability search http://gateway.costar.com/Gateway/

acres) in North Kirklees and only 11.83 hectares (29 acres) in the South Kirklees functional market economic area. A further breakdown of this available land in South Kirklees is provided in section 2.4.3.

The take up over the period 2004/5 to 2014/15 in Kirklees region is shown in the table below. This is taken from the Employment Needs Assessment Technical Paper dated November 2016 and shows that over the ten year period take up has slowly fallen from the high experienced over 2004/5.

Year	Take up/ Hectares	Take up/ Acres
2004/5	19.86	49.08
2005/6	0.51	1.26
2006/7	15.70	38.80
2007/8	13.33	32.94
2008/9	15.44	38.15
2009/10	9.00	22.24
2010/11 & 2011/12	10.08	24.91
2012/13	8.11	20.04
2013/14	8.06	19.92
2014/15	7.04	17.40
Average	10.71	26.47

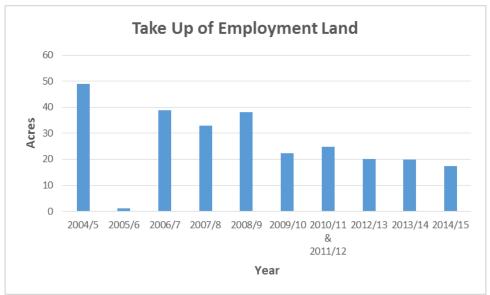


Chart 5 – Take up of Employment Land (Source: Kirklees Local Plan Annual Monitoring Report)

The chart above shows that the take up of employment land has remained fairly constant since 2009/10, however this is below the levels experienced in the period 2004/5 to 2008/9. The level of take up experienced in 2008/9 is surprising given that this was during the last recession. However the difference between the take up level in 2007/8 and 2008/9 is only 5 acres and this could be accounted for by one single transaction compared with the previous year.

In terms of the future take up of employment land little development has occurred in recent years (equating to only an average of only 20 acres of take up during 2012/13, 2013/14 and 2014/15) owing to a lack of demand from existing occupiers for grow on space with only the prime sites developed for employment within the Kirklees region. However the recent continued growth of the economy has led to an increase in occupier confidence leading to the expansion of businesses and requirements, although the potential impacts of Brexit remain to be seen. Where occupiers have requirements they have initially looked at the existing stock to satisfy

their requirements. Conversations with JLL industrial agents have established that this increase in demand for existing stock has led to inflationary pressure on rents, which has made development of employment stock more viable within Kirklees. Additionally much of the remaining stock within the Kirklees region is dated and second hand and therefore of poor quality not satisfying the requirements of modern employment occupiers. With this in mind it is considered that the take up of employment land will increase in order to develop new units to satisfy the requirements of existing occupiers who wish to expand their operations.

2.3.2 Demand

Whilst it is very difficult to quantify the total amount of latent demand for commercial space in Kirklees, a review of the Kirklees Employers Survey 2013 (the latest available) has established that employers expect their workforces to increase over the next few years. Also 15% of all employers in Kirklees have said that they will require further land or premises within the next three to five years. Of those which are planning to expand 73% will remain in the wider area.

Local and regional businesses do not tend to publish their requirements for extra space and therefore it is difficult to quantify the total amount of latent demand which is currently in the market. However, discussions with local agents, acting on behalf of the CWDCL, and local occupiers have established that there is a considerable amount of latent demand within Kirklees.

Occupier	Current Location	Size of Requirement/sq ft	Use Class of Requirement
Cummins	Huddersfield	180,000	B2
AUS	Clayton West	15,000	B8
Newburn Power Rental	South Kirkby	Unknown	B2
Pink Link	Oakes	Unknown	B8
R&D Sheetmetal	Huddersfield	20,000	B2
Agrosmart	Clayton West	30,000	B2
Confidential	Huddersfield	40,000	B8
Wellhouse Leisure	Shelley	15,000	B8
Frame Tech Structures Ltd	Ravensthorpe Industrial Estate	Unknown	B2
Phoenix Textiles	Clayton West	80,000	B2
Staples Group	Huddersfield	30,000	B2
Manzana Contracts	Milnsbridge	Unknown	B8
Pet Brands	Ravensthorpe	70,000	B8
Buy it Direct	Huddersfield	350,000	B8
Time 4 Sleep Ltd	Milnsbridge	40,000	B2
Delta Adhesives	Barnsley	20,000	B2
Abode	Huddersfield	25,000	B1/B2
Alco Valves	Brighouse	60,000	B2
Wesco Aircraft Ltd	Clayton West	100,000	B2
Macs Trucks	Outlane	25,000	A1
Melett	Barnsley	60,000	B2
Connection Seating	Dewsbury	100,000	B2
Storm Trading	Clayton West	10,000	B1
Ardor Engineering	Bradford	20,000	B2
Total		1,290,000	

The above table contains a total of 24 active requirements which equate to 120,000 sq m (1.29 million sq ft) of floorspace within Kirklees. It is considered that these occupiers would wish to remain in their current location in order to maintain the satisfaction of employees. However if suitable accommodation cannot be found within the

immediate locality to satisfy the requirements then it will be necessary for the occupiers to widen their search area.

Whilst it is possible that some of the above requirements could be satisfied by existing supply many of the requirements above have been in the market for some time without finding any space to satisfy their requirement. It is also interesting to note that there are three requirements in the table above which are over 9,290 sq m (100,000 sq ft) which cannot currently be satisfied within Kirklees. In addition to the above JLL are also aware of a large requirement for over 9,290 sq m (100,000 sq ft) from Adare, based in Clayton West, who have agreed a deal in principle to move to a business park outside of the Kirklees District.

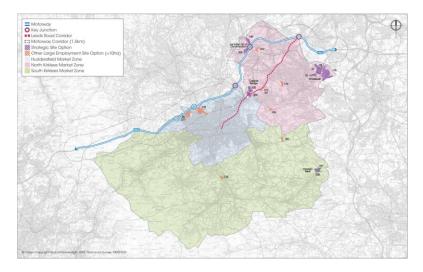
It can be seen from the above that there are a total of 5 occupier requirements currently active within the Clayton West area which equates to a total floorspace requirement of 21,832 sq m (235,000 sq ft). It is considered that these requirements would only be satisfied by the provision of new, good specification employment space. Once an employment centre of sufficient critical mass has been created this will also lead to further requirements, which are yet to be published, from occupiers who are already present within South Kirklees and Clayton West.

The smallest published requirement is 1,393 sq m (15,000 sq ft), however, the analysis contained in section 2.2.2 established that the average size of deal in the search area was 604 sq m (6,500 sq ft). It is considered that the majority of requirements under 929 sq m (10,000 sq ft) are not published and therefore there will be some latent demand in addition to the above which will be captured by the provision of good quality employment accommodation across the Kirklees region.

Looking at the use classes above, 16 (64%) of the requirements are currently from B2 use class operators. There are 8 B8 operators and only one B1 operator. There is also a truck sales operator who would operate under the sui-generis use class.

2.4 South Kirklees Functional Market Economic Area

The Kirklees Employment Market Strength Assessment dated September 2015 undertaken by GVA reviews the market strength of the employment sector within Kirklees. The report splits the different areas of Kirklees into different functional market economic areas (FEA). Clayton West lies within the South Kirklees FEA. The South Kirklees FEA is hindered by constraining characteristics which are limiting the growth of the employment sector. The constraints include the topography and rural nature of the area, market perception amongst occupiers and the presence of competing sites. The map of the South Kirklees economic area is contained below (shaded green):



2.4.1 Supply

In terms of availability of stock in South Kirklees FEA there is little stock available, only 16,400 sq m (177,000 sq ft)⁴, which is symptomatic of the constraining characteristics of South Kirklees FEA. These constraints are limiting the growth of the employment sector in South Kirklees. The constraints include the topography and rural nature of the area, market perception amongst occupiers that South Kirklees is an inaccessible rural area and the presence of competing sites. These constraints mean that many of the residents in the sub region have had to travel to work either to the wider Kirklees region or outside of the Kirklees region which does not mean that the employees can travel to work sustainably by either walking or using public transport.

South Kirklees has a number of natural constraints including topography and rural nature of the area. This is particularly true in the west of the FEA around the Honley and Kirkburton and Denby Dale areas where the topography of the area has meant that the strategic access is poorer when compared to the rest of the FEAs in the Kirklees region. The topography and strategic access has meant that other areas of Kirklees, particularly the Huddersfield and East Kirklees FEAs, have been more attractive to large regional and national occupiers as verified through discussions with agents and occupiers.

Discussions with agents and occupiers have revealed that the South Kirklees FEA tends to cater for more local market demand with larger national occupiers preferring to be located in the Huddersfield and East Kirklees FEAs. This is mainly due to the provision of good quality stock within the area. However the east of the South Kirklees FEA has the benefit of the Wakefield Road Corridor which is the most advantageous location, in terms of strategic access, within South Kirklees. This has led to Clayton West being identified the key strategic site to deliver employment development over the plan period by the Council. During the conversations with commercial property agents Clayton West was referenced as a key strategic opportunity if employment growth is to take place in South Kirklees FEA.

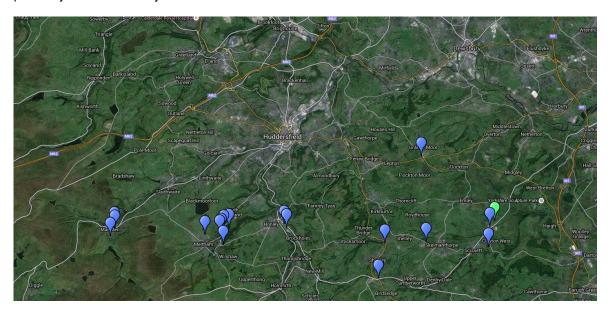
In terms of the current employment land supply in the South Kirklees FEA there is a total of just 8.28 hectares (20 acres)⁵ available for development. The table below provides a summary of the land which is identified in the employment land supply:

Size of Site/ Ha	Total/ Ha	Number of Sites
Less than 0.4	1.24	10
0.4 to 3.99	7.04	6
4.0 to 7.99	0.00	0
8.0 and over	0.00	0
Total	8.28	20
Source: Employment N	per 2016	

⁴ Co-Star online availability search http://gateway.costar.com/Gateway/

⁵ Kirklees Local Plan – Technical Paper: Employment Needs Assessment, November 2016

The map below shows the locations in the South Kirklees FEA where the sites are currently allocated for employment. It can be seen that the majority of sites are situated in the west of the FEA which is constrained by topographical and accessibility issues and therefore these are unlikely to appeal to occupiers. The green paddle symbolises the subject site.



The total land which is currently available for employment development in South Kirklees is split across 16 sites with no sites currently available over 4 hectares (9.88 acres) which means that large requirements for space over 4,645 sq m (50,000 sq ft) cannot be accommodated. The average size of the sites is 0.65 hectares (1.61 acres) which would satisfy a requirement of no more than 2,322 sq m (25,000 sq ft). This has meant that larger requirements have not been able to be satisfied within the Kirklees FEA and has limited the growth of existing businesses. It should be noted that there are at least three requirements for space over 4,645 sq m (50,000 sq ft) in Clayton West which are currently not able to be satisfied by the Council's identified land supply.

2.4.2 Demand

Take up of employment land within South Kirklees has, historically, lagged behind the North and East sub regions of the wider Kirklees region. Meltham and Denby Dale have seen a total take up of 3-4ha of employment land taken from 2006 - 2014, and Honley and Kirkburton both seeing a take up of 2-3ha'6. Additionally there has been some loss of employment land due to residential development. This is particularly true in Holme Valley South where over 10 ha (24.71 acres) were lost along with 5 ha (12.36 acres) in Denby Dale and 4 ha (9.88 acres) in Kirburton.

The above figures are unsurprising given the identified constraints of South Kirklees and the lack of viable commercial development opportunities within the FEA. It is interesting to note that there has been more allocated commercial land lost for residential development than there has been developed out for commercial across the sub region. This highlights the fact that homeowners in South Kirklees have to travel to the wider Kirklees region or further afield in order to reach their place on employment.

In terms of occupier requirements a review of the requirements contained within section 2.3.2 has established that there is a total of 6 requirements currently active within the South Kirklees area as follows:

⁶ Kirklees Employment Market Strength Assessment, GVA, September 2015.

Occupier	Current Location	Size of Requirement/sq ft	Use Class of Requirement
AUS	Clayton West	15,000	B8
Agrosmart	Clayton West	30,000	B2
Wellhouse Leisure	Shelley	15,000	B8
Phoenix Textiles	Clayton West	80,000	B2
Wesco Aircraft Ltd	Clayton West	100,000	B8
Storm Trading	Clayton West	10,000	B8
Total		250.000 sa ft	

It can be seen from the above that there is a total of 23,225 sq m (250,000 sq ft) of requirements for employment space currently active within the South Kirklees FEA which is spread across a total of 6 requirements. All of these requirements are over 929 sq m (10,000 sq ft) and can only be satisfied through the provision of good quality new employment space within the South Kirklees FEA. It is also interesting to note that 5 of the total requirements are from occupiers who operate in Clayton West, who wish to stay in the immediate locality but there are no suitable premises available and there is no land currently allocated to satisfy the requirements over 4,645 sq m (50,000 sq ft). However if the subject site was allocated for employment development then these requirements could be satisfied.

JLL are also aware of a large requirement of circa 9,290 sq m (100,000 sq ft) which has entered the market from Adare to move from their current premises in Clayton West. However it is understood that Adare have now shortlisted a site in the Wakefield District although Adare's preference was to stay within Clayton West but there were no opportunities for them to relocate within the Town.

In addition to the above there is a 5,574 sq m (60,000 sq ft) requirement from Mellett who are currently located in Barnsley. Mellett were originally located in Clayton West but had to move to Barnsley, in 2011, because of the lack of suitable accommodation within the Town. Mellett would be a key target for the subject in the future.

All of the requirements are for employment space over 929 sq m (10,000 sq ft). It is unusual for requirements under 929 sq m (10,000 sq ft) to be published by occupiers, however it is considered that there is substantial latent demand within this size bracket from occupiers within the South Kirklees FEA but it is extremely difficult to quantify the level of this demand. Occupiers of this size do not tend to publish their requirements or employ an employer's property agent to find them space as this is costly. Also this size of requirement does not create sufficient critical mass on a site in order to persuade a developer to develop space to their requirements. Therefore this size of occupiers usually reacts to space which is provided speculatively within the market.

It is clear that irrespective of the size of requirement there is considerable latent demand within the South Kirklees FEA which will be satisfied by the provision of good quality employment space within an accessible location.

2.4.3 South Kirklees FEA Conclusion

The above analysis has shown that there are no large sites available or promoted for employment development meaning that larger requirements cannot currently be accommodated within South Kirklees.

There is considerable demand currently in the South Kirklees FEA with a total of 6 active requirements equating to a total of 23,225 sq m (250,000 sq ft) of employment space. All of these requirements cannot currently be satisfied by the current employment land supply within South Kirklees FEA, particularly those over 4,645 sq m (50,000 sq ft).

Given the constraints and inaccessibility of much of the South Kirklees FEA careful consideration needs to be given to the location of sites which could be allocated for employment development. Any sites allocated should be accessible within the east of the South Kirklees FEA along Wakefield Road.

2.5 Clayton West

2.5.1 Supply

With regard to Clayton West, our availability search and site visit revealed that there is a total of circa 1,858 sq m (20,000 sq ft)⁷ of industrial accommodation currently available which offers a reasonable specification of space. This is split between two units, one on Colliers Way and one off Wakefield Road. Both these are situated to the west of the subject site. The available unit on Colliers Way provides up to 1,486 sq m (16,000 sq ft) of industrial property and the other unit, on Wakefield Road, provides 372 sq m (4,000 sq ft) of industrial accommodation.

There is a very limited amount of office space currently in Clayton West and, subsequently, there are very few office occupiers in the town. However, it is clear that, historically, there has been little demand from office occupiers to drive office development in this location.

In terms of future supply there are three sites which are contained in the current identified employment land supply in Clayton West. However it should be noted that none of these sites are currently being marketed and therefore no allocated employment site are immediately available in Clayton West. Additionally JLL are aware that the former Adare site is now proposed to be released for residential further reducing the supply of employment land within Clayton West. The details of the identified employment land sites are as follows:

- Wesco Aircraft Ltd, Park Mill Way, Clayton West This 0.13 hectare (0.32 acre) site is a brownfield site which has been earmarked as expansion land for the existing occupier. The land could provide a total of 1,275 sq m (13,700 sq ft) of accommodation. Given that this is owned by the adjacent landowner, it is anticipated that this would only be developed should the occupier wish to expand. However Wesco Aircraft Ltd currently has a published 9,290 sq m (100,000 sq ft) requirement for new space within Clayton West which indicates that this expansion land is not suitable for expansion of their operations.
- Aqua Interiors, Green Park House, 2a Colliers Way, Clayton West This 0.20 hectare (0.50 acre) site is identified in the UDP as expansion land. The site is brownfield and has a capacity of only 1,717 sq m (18,481 sq ft). Given that this is owned by the adjacent landowner, it is anticipated that this would only be developed should the occupier wish to expand.
- Spring Grove Mills, Wakefield Road, Clayton West This brownfield site has an expired planning permission for 2,180 sq m (23,465 sq ft) of industrial development. The site has been classified as being available for development and has not been earmarked for expansion for an adjacent occupier.

Two of the above sites have been earmarked for expansion of an existing occupier with only one, Spring Grove Mills, currently available for development on the open market. Spring Grove Mills can provide a maximum of 2,180 sq m (23,465 sq ft) of industrial development. It is anticipated that if this site was developed an adjacent business who is occupying dated stock would look to relocate in to the new stock provided. This would therefore leave a shortage of good quality stock around Clayton West.

⁷ Co-Star online availability search http://gateway.costar.com/Gateway/

2.5.2 Demand

There are a total of 5 occupier requirements currently active within the Clayton West area. The total floorspace attributable to these requirements is 21,832 sq m (235,000 sq ft). It is considered that these requirements would only be satisfied by the provision of new, good specification employment space. However there are only three sites which are allocated for employment development within Clayton West. These have the potential to provide a total of 5,170 sq m (55,000 sq ft) of employment accommodation, not enough to capture the current published requirements which are active in Clayton West. It is also worth noting that whilst these sites have been earmarked for expansion of existing firms, at least one, Wesco Aircraft Ltd, has published a requirement which suggests that the land identified for expansion is not fit for their purpose. The other two remaining identified land parcels could satisfy the expansion of the existing occupiers however neither of these occupiers have a published requirement for space within Clayton West.

2.5.3 Clayton West Conclusion

Clayton West is situated in the east of the South Kirklees FEA which is the most attractive location for employment occupiers within the FEA as the site is the most accessible within the sub-region around 10 minutes from the M1 motorway along the Wakefield Road corridor. However the analysis of the property market in Clayton West has revealed that there is very little available employment space within Clayton West and the small amount of available employment land means that the amount of employment space cannot be increased significantly.

There is a total 5 occupier requirements currently from occupiers who are present in Clayton West totalling 21,832 sq m (235,000 sq ft). It has been established through discussions undertaken between the promoters of the subject site and the occupiers with published requirements that the occupiers wish to stay within the Clayton West area. This is due to not wanting to unsettle the existing workforce and having to find new skilled trained employees. However currently there is no accommodation which can satisfy their requirements and there is no land identified for employment development of sufficient scale which can be developed for employment space to satisfy the requirements. This has been demonstrated by the fact that the Adare requirement could not be satisfied within Clayton West and consequently they have shortlisted a site which is out of the Kirklees District.

The subject site at Clayton West is the optimum location within the South Kirklees FEA situated in close proximity to the M1 motorway and along the Wakefield Road corridor and could be developed for employment to satisfy the latent demand which is currently available in the market. Additionally, once the majority of the existing requirements have been satisfied on the site this will create sufficient critical mass on the site to attract latent demand from other occupiers and allow the employment sector in South Kirklees FEA to grow.

This continued growth of the employment sector within the South Kirklees FEA will be generated by the continued growth of the economy which will lead to an increase in occupier confidence leading to the expansion of businesses and requirements. Additionally a review of the Kirklees Employers Survey 2013 (the latest available) has identified that 21% of employers expected their workforce to increase over the next 12 months, with 23% in the manufacturing sector.

Fifteen per cent of all employers in Kirklees are of the opinion that their business will require further land in the next three to five years. Additional land or space is most likely to be needed for warehousing and storage (40% of those requiring more space), with 35% of employers that need more space requiring additional office space. One in six (17%) require more manufacturing space. Of those requiring more land or space, 31% will remain at their current location and expand there. More than half (57%) will move. The majority of those planning to relocate as a result of the need for extra space (73%) will remain within the District. Just 9% are likely to leave

Kirklees, with the remaining 18% as yet unsure. In aggregate, including those planning to relocate to gain more space, 17%, circa 1,650, of all employers in Kirklees may relocate within the next three to five years.

2.6 Review of Historic Large Scale Requirements

In light of the Adare requirement not being able to be satisfied within the Kirklees District JLL have also undertaken a review of the large scale industrial lettings of over 9,290 sq m (100,000 sq ft) which have been agreed on the Yorkshire market during the period 2011 – 2015. The take up of commercial floorspace over the period is summarised in the chart below. It can be seen that the take up per annum over the previous five years has grown to a peak of over 250,000 sq m (2.70 million sq ft) of deals in 2015. The average take up per annum for the five year period is 183,000 sq m (1.97 million sq ft). The total number of transactions over the period is 48 at an average of c. 10 per annum.

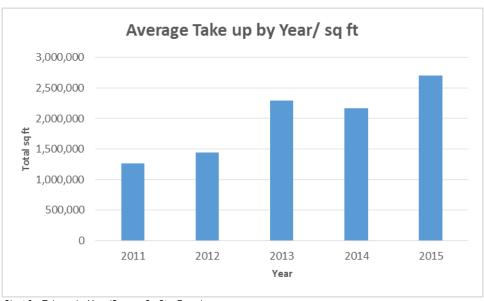


Chart 6 - Take up by Year (Source: Co-Star Focus)

In terms of the average size of the transaction for Yorkshire and the Humber over the five year period this equates to 18,860 sq m (203,000 sq ft).

JLL have also undertaken a search which reviews the transactions over 9,290 sq m (100,000 sq ft) which have taken place in West and South Yorkshire. 86% (78,590 sq m (8.46 million sq ft)) of the total floorspace that was transacted in deals over 9,290 sq m (100,000 sq ft) was within the West and South Yorkshire sub region over the five year period. This equates to an average take up of 155,000 sq m (1.67 million sq ft) per annum. The total number of transactions within the sub-region is 40 which equates to 8 per annum. The average transaction size for the sub region is 19,600 sq m (211,000 sq ft).

Whilst the above shows that there is strong demand for large scale industrial uses within West and South Yorkshire it is interesting to note that there have been no large scale lettings for industrial property over 9,290 sq m (100,000 sq ft) over the five year period within the South Kirklees FEA. However discussions with a number of occupiers within the Kirklees District have established that there are over five requirements (including Adare) totalling space of 79,000 sq m (850,000 sq ft) for space over 9,290 sq m (100,000 sq ft) which could be satisfied by the provision of modern large scale industrial space within the Kirklees District.

As has been shown by the Adare requirement there is very little opportunity within Kirklees to provide space to satisfy these requirements and therefore these requirements are having to be satisfied outside of the Kirklees District. Full scale redevelopment of the whole of the subject site offers the opportunity to secure the larger

scale requirements within the Kirklees District. A smaller scale development, such as that being proposed by the Council, may not allow the larger scale developments to be satisfied which is explored further in section 3.5 of this report.

3 Site and Building Requirements

3.1 Site Characteristics

The site is situated at the northeastern edge of Clayton West, within the Wakefield Road corridor, which is the closest site to the M1 Motorway within the South Kirklees FEA. The subject site lies to the north and south of the A636 (Wakefield Road) and is circa 8 miles and 10 minutes' drive to the southwest of junction 39 of the M1 Motorway. This location and scale of the site gives the subject an advantage over the existing commercial property within Clayton West, providing the opportunity to develop a high quality business park of sufficient scale to attract existing occupiers already present in Clayton West, South Kirklees FEA, wider Kirklees and the wider identified sub-region, as well as new businesses who are looking to move into the area.

The distance from the motorway network would preclude large scale distribution operators locating at the subject site as the location and current fuel prices would add significant operational costs when compared to competing sites which are closer to the M1, including Markham Vale by Henry Boot. In addition to Markham Vale, there is also 22 acres of development land currently available at Silkwood Park, which is adjacent to Junction 40 of the M1 Motorway, which is better placed than Clayton West to take advantage of any large scale distribution requirements which come to the market. However, it is considered that the site would be appropriate for smaller scale B8 occupiers and B2 operators who wish to remain in the South Kirklees FEA or new occupiers who want to locate within South Kirklees. It is interesting to note that there are at least three large scale requirements (over 2,787 sq m (30,000 sq ft)) for employment space within Clayton West.

The greenfield agricultural nature of the site means that the current access is provided by gates in to the individual fields or by single tracks. However an assessment undertaken by transport consultants, Fore Consulting, has established an appropriate and viable access solution for the site.

Given the constraints of the South Kirklees FEA particularly with regard to access the subject site is considered to offer a good opportunity for employment development given that the site is situated within the Wakefield Road corridor, which is the most accessible within the South Kirklees FEA. The site is also situated away from existing large scale residential on the eastern edge of Clayton West meaning that the site is accessible without attracting heavy goods traffic through the established residential areas. However the site is also situated to provide good transport and pedestrian connections to the Town.

3.2 Characteristics of Commercial Property Within Clayton West

3.2.1 Industrial Property

The majority of supply in Clayton West is of low quality stock which is currently occupied by local businesses. The stock provided is a mixture of converted mill space and dedicated industrial space. However, the majority of industrial space provided has been extended over a period of years leading to stock of varying ages and quality. The quality of the stock provided is best demonstrated by the fact that Wesco Aircraft Limited occupy some of the best accommodation in Clayton West but the site is split with the ancillary office element of the business situated more than 200 metres away from the industrial element on a separate site. This has led to Wesco Aircraft having a B8 requirement for circa 9,290 sq m (100,000 sq ft) of employment space.

In terms of the size of the existing industrial units provided the majority are below 1,860 sq m (20,000 sq ft). The majority of units over 1,860 sq m (20,000 sq ft) have been extended to provide the necessary amount of floorspace for occupiers. These extensions mean that many of the units now have insufficient parking or yard space and therefore if the existing occupiers want to expand they have to look for alternative accommodation,

however, there is very little space of this size and quality within Clayton West and occupiers could be forced to leave Kirklees in order to find appropriate industrial space.

3.2.2 Office Space

There is very little office space within Clayton West and no available space has been identified by the site visit or the online searches JLL have undertaken. However, the majority of office space provided consists of dated stock which is occupied by industrial occupiers using the space as ancillary to their operations. Additionally, there are some modern hybrid units which appear to be well occupied and provide a good standard of space, however this space is limited and there is currently no space available. It is clear from the lack of dedicated office space provided that there is currently little demand for dedicated office space within Clayton West, however, there is no office space available.

Should office space be provided in the early phases of the subject development this is likely to be as a result of a specific occupier requirement rather than the office space being provided on a speculative basis. However, once a critical mass of office occupiers has been established this may allow speculative office development.

3.3 Where Will Occupiers Come From?

It has already been established that the subject site offers a significant opportunity to grow the employment sector within the constrained South Kirklees FEA. Additionally there is considerable latent demand from occupiers for good quality commercial space at Clayton West, with a total of 5 Clayton West occupiers currently having requirements for a total of 21,832 sq m (235,000 sq ft) of employment accommodation. However all the requirements which have been published are for space over 929 sq m (10,000 sq ft). It is considered that the majority of requirements under 929 sq m (10,000 sq ft) are not published and there will be some latent demand in addition to the above which will be captured by the provision of good quality accommodation at the subject. However, it is very difficult to quantify the level of latent demand which might be attracted to the subject site.

The analysis has demonstrated that there is sufficient latent demand in the market to develop a critical mass of employment development at the subject site thus making a new business park a viable option for national and regional occupiers who have previously not considered the South Kirklees FEA. The subject site is situated on the Wakefield Road corridor which is the premium location in the South Kirklees FEA and will satisfy the latent demand which is currently present in Clayton West and the South Kirklees FEA. Once the business park has reached sufficient critical mass this location on the Wakefield Road corridor will continue to attract other occupiers who want to be located adjacent to fellow likeminded occupiers allowing the organic sustainable growth of the business park. This organic growth is likely to come from other occupiers currently present in the South Kirklees FEA along with new businesses who are looking to grow.

The organic growth of business parks can be referenced by case studies from established business parks elsewhere in the region. Henry Boot's Markham Vale business park took around five years to establish itself through the development of employment space once active requirements had been secured. However now that sufficient critical mass of occupiers has been reached speculative development is beginning to take place and the development is expected to grow organically attracting a range of local, regional and national occupiers.

Silkwood Park is another business park case study which offers good comparison to the subject. Silkwood Park comprised a greenfield development undertaken on a 40 hectare (98 acre) site adjacent to Junction 40 of the M1 motorway some 2 miles to the west of Wakefield city centre. The scheme took circa 10 years to initially create the critical mass of development to make speculative schemes viable rather than reacting to specific occupier requirements. The scheme has been undertaken as a mixed use development and in addition to office and industrial/distribution users has attracted Days Hotel, a Total Fitness Health Club and Benfield Toyota to

this location. Following bespoke developments for the likes of Ahead Distribution, Technal and Bezier there is some land still available (circa 3.64 hectares (9 acres)) however it is expected that this land will be taken up in the next five years. Additionally the developers of Silkwood Park are in advanced discussion with Adare in order to secure their requirement.

3.4 Employment Sectors Likely to be Attracted to the Subject Site

In terms of the employment sectors which are likely to be attracted to Clayton West, it is considered that commercial use classes B1, B2 and B8 occupiers are all likely to be attracted to the site. It is clear from the research undertaken that there is latent demand from all these use classes for space in the South Kirklees FEA. However, given the locational benefits of the subject site it is considered that more industrial occupiers will be attracted to the proposed scheme when compared to office occupiers. Clayton West has, historically, not been a location of choice for office occupiers and therefore very little office development has taken place.

In terms of what the composition of the business park might look like at the subject site the early elements of the site will be driven by occupier demand, until sufficient critical mass is reached. However, as the business park establishes itself speculative development will become more viable. JLL would expect a broad range of employment uses, through B1, B2 and B8 development, but with a heavier slant on B2 and B8, with limited B1. It is considered that a development of 10% B1 Office, 60% B2 Industrial and 30% B8 Warehouse and Distribution would be appropriate at the subject. However, in order for the business park 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.

3.5 Appropriate Amount of Floorspace at the Subject Site

The analysis has revealed that there is a considerable amount of published demand from existing occupiers within the South Kirklees FEA equating to 23,225 sq m (250,000 sq ft). Any employment development at the subject is likely to capture these requirements and therefore create a sufficient critical mass on the site.

Following the creation of the critical mass of employment occupiers on the site it is clear that the subject would become the employment centre of choice within the South Kirklees FEA taking advantage of the locational benefits of the site along with the presence of employment occupiers. Once the subject site has become the employment location of choice for occupiers it is clear that any B2 and smaller B8 occupiers with requirements for the Kirklees and wider sub-region would consider locating at the subject thus growing the floorspace at the site beyond the initial 23,225 sq m (250,000 sq ft) of requirements.

It is clear that given the lack of available commercial space within Clayton West and historically the lack of large sites to accommodate occupiers' requirements that the amount of latent demand has risen over the past decade to the current level of 23,225 sq m (250,000 sq ft) in South Kirklees FEA. It is unlikely once these requirements have been satisfied that there will be the same amount of requirements in the market in the short term, however the subject site will be well placed to capitalise on any requirements as they are bought to the market. In terms of the amount of take up per annum once a critical mass has been established at the subject site this is very difficult to accurately predict however an average of 2,322 sq m (25,000 sq ft) per annum could be achievable however there would be years when more than this is achieved. These levels of average take up have been experienced at both Markham Vale and Silkwood Park in recent years.

Whilst the allocation of a smaller area of the site for cmployment use would not affect the average take up per annum, a commercial development on the smaller area of the site could mean that the amount of business floorspace is not maximised at the site and therefore opportunities described above could be missed. Meaning that if the subject site was part way through the organic sustainable growth and Clayton West Development

Company Limited (CWDCL) were approached by an occupier with a large scale requirement of over 9,290 sq m (100,000 sq ft) then this could not be accommodated on the proposed smaller allocated site and the requirement could be lost to neighbouring Districts. If the full extent of the site being promoted by CWDCL was allocated then more floorspace could be accommodated on the site offering greater flexibility and allowing the development to react to the market and secure the larger scale requirements.

Conversely if a large scale requirement was secured early in the development process then the smaller scale requirements which have been highlighted in this report could be missed as they could not be accommodated within the smaller site.

The development of an employment centre such as the one proposed would take place over the Plan period up to 2031. It is considered that the initial requirements from the current Clayton West occupiers could be captured in the first five years of development. If total requirements of circa 2,322 sq m (25,000 sq ft) per annum could be captured once a critical mass has been established then this would mean that a further 27,870 to 37,160 sq m (300,000 to 400,000 sq ft) could be developed over the period of the development. A total employment development of 52,488 to 61,779 sq m (565,000 sq ft to 665,000 sq ft) could therefore be achievable at the subject site over the plan period.

3.6 Appropriate Development Density at the Subject Site

Kirklees Council have proposed to allocate a gross site area of 16.82 Ha (41.56 acres) which the Council anticipate to give a net site area of 14.89 Ha (36.79 acres) and a capacity of 52,115 sq m (560,980 sq ft). However in order to provide a high specification scheme which will attract occupiers the development will need to include areas for occupier car parking and ancillary yard space. Additionally areas for expansion will be of particular importance for potential large scale occupiers of over 9,290 sq m (100,000 sq ft) as these occupiers typically want areas for expansion of their operations.

KPP Architects in their site capacity assessment of the Council proposed site area have established that owing to the topography of the site, the need to provide SUDs and balancing ponds and the need to provide a high specification development have established the site capacity would be more likely to be in the order of 34,790 sq m (374,500 sq ft) of commercial development (depending on the final configuration).

The Council's assumed floor area is therefore high. Whilst this could be accounted for by the development of units with mezzanine levels, there are few modern occupiers who require mezzanine levels and therefore it is expected that only a small number of units provided on the site will, in fact, have mezzanine levels. The reason why mezzanine levels are often not popular with occupiers is that it restricts the floor to ceiling height of the property therefore reducing the mechanised storage space. Therefore if mezzanines were to be included across the scheme occupiers would require an increase in the height of the units meaning a greater visual impact on the landscape. Given the lack of demand for standard units with mezzanine floors the density will therefore be lower than that suggested by the Council in their proposed allocation.

KPP Architecture in their site capacity study for the larger site area, as previously proposed by CWDCL for allocation, have established that the development capacity of the larger site is in the order of 56,760 sq m (611,000 sq ft) of business development. As KPP's plans show this larger site allows greater flexibility to satisfy both the larger scale requirements of over 9,290 sq m (100,000 sq ft) and small scale requirements of under 929 sq m (10,000 sq ft) which will be attracted to the site during the plan period. It is considered that the proposed smaller site area would not allow as greater flexibility meaning that only small scale requirements or a single large scale requirement could be secured by the development.

4 Confidentiality and Publication

Finally, and in accordance with our normal practise, we confirm that the Report is confidential to the party to whom it is addressed for the specific purpose to which it refers. No responsibility whatsoever is accepted to any third party and neither the whole of the Report, nor any part, nor references thereto, may be published in any document, statement or circular, nor in any communication with third parties without our prior written approval of the form and context in which it will appear.



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APPENDIX 4

FEASIBILITY STUDIES



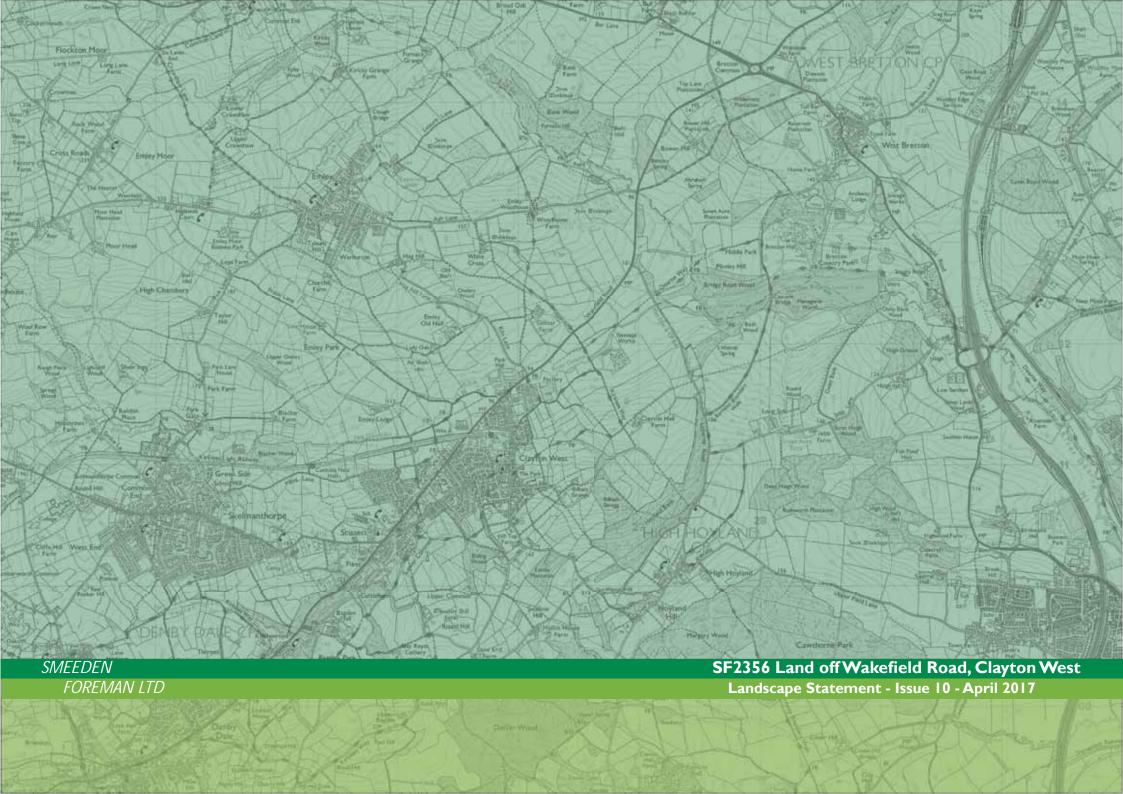






APPENDIX 5

LANDSCAPE STATEMENT



Document Check Sheet

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1.0 Introduction

This Landscape Statement supports Representations made by Quod on behalf of Clayton West Development Company Limited ("CWDCL") in response to Kirklees Metropolitan Borough Council ("the Council")'s consultation on the publication draft of the Kirklees Local Plan (November 2016) ("the draft Local Plan").

The Council is proposing to allocate 16.79ha of the CWDCL Land for employment development in the draft Local Plan (Policy E2333a), as located at Figure 1.1.

CWDCL support the Council's intention to allocate land to accommodate up to 52,115 sq m of employment floorspace

and this Landscacpe Statement demonstrates that the E2333a site can be developed with acceptable affects upon landscape and visual amenity.

However, the proposed allocation covers a considerably smaller area than that promoted by CWDCL through the Call for Sites Exercise and in all representations since that time, extending to just 16.79ha (gross) as opposed to the 25.7ha promoted.As a consequence we consider that the Council's proposed allocation site would not be fully effective in defining a new Green Belt edge, and would afford limited space within the site to incorporate appropriate landscape to assimilate new development within the landscape.

It is also considered that the extent to which potential impacts would be increased through the development of the CWDCL site, are minor and the ability for the CWDCL site to offer stronger, defensible boundaries to the Green Belt and increased scope for the provision of green infrastructure that could appear more appropriate to local character and landscape pattern and offer greater visual and environmental benefits.

In early 2015 Smeeden Foreman prepared a Landscape Statement which appraised the ability of the land to accommodate development. The land considered is shown at Figure 1.2 and is herein referred to as the CWDCL land.

Kirklees District Council had identified the site as appropriate for employment development to meet the Borough's economic needs and as such it proposed in a large part to be removed from the Green Belt. The original site included within the Kirklees draft Local Plan in ovember 2015 is illustrated at Figure 1.3. This Landscape Statement considers the appropriateness of the draft allocation area and the CWDCL land in landscape, visual, Green Belt and heritage terms.

The CWDCL land is located within the Green Belt and as such, any development occurring within it must

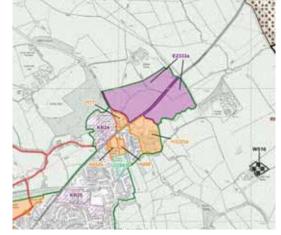


Figure 1.1 Extract of Kirklees (South East) Policies Map, Publication Draft Local Plan, November 2016

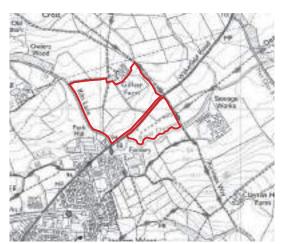


Figure 1.2 Extent of CWDCL proposed site

utilise, or create a strong new Green Belt boundary which must be robust and defensible against future development demands in order to achieve the objectives of the Green Belt, as set out at paragraph 80 of the NPPF. In allocating the site, the council are redefining their Green Belt boundaries. Consideration is given in section 6.0 to the boundary of the originally allocated site (E2333) to determine the most defensible limit and to ensure that the Green Belt meets the five purposes of Green Belt land as set out at Paragraph 80 and provides new boundaries to the Green Belt that are clearly defined and defensible, as set out at Paragraph 85 of the NPPF.

This document provides information about the existing condition of the landscape, landscape character, openness and surrounding visual amenity. An illustrative landscape strategy plan has also been produced which illustrates the potential extent and nature of development and landscape benefits.

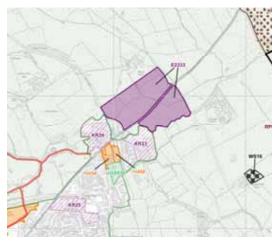


Figure 1.3 Extract of Kirklees (South East) Policies Map, Draft Local Plan November 2015

In considering potential landscape and visual impacts,

further assessment has been undertaken of the potential impacts upon the Scheduled Monument of Bentley Grange ironstone pits and the Registered Park and Garden of Bretton Hall that may arise from development of the site. This is contained at Chapter 5 of this report. Commentry made by the Kirklees Landscape Officer has also involved further site work and analysis and which is contained at Section 8 of this document, and which has been based upon the now redefined site boundary as set out within the draft Local Plan Policy E2333a (Figure 1.1).

Landscape architects carried out site survey work in December 2014, January, November and December 2015 and further site work in response to comments raised by Kirklees' Landscape Officer during July 2016, and undertook further site and appraisal work in response to commentry from Historic England during March 2017.

I.I Appraisal Methodology

While this document does not comprise a formal Landscape and Visual Impact Appraisal (LVIA), the site survey and base line work has been undertaken with a view that should the CWDCL land be considered appropriate for development, further assessment will be undertaken. Methodologies are outlined below for each element of appraisal work undertaken.

I.I.I Scope and Study Area

A distinction is made in this document between the study area, the CWDCL land and the allocation site, whereby the study area includes both site extents and the surrounding landscape over which there is potential for visual or landscape impacts arising through their development. The extent of the study area is defined through the utilisation of computer generated Zones of Theoretical Visibility (ZTVs), through the compilation of desk based research and by undertaking site work (refer to Figure 1.4).

This study considers the visual amenity of the CWDCL land and the surrounding area and identifies visual receptors and the approximate visibility of the land were it to be developed. The study area is defined as the Zone of Theoretical Visibility (ZTV) and it is 'the area in which a proposed development may have an influence or effect on visual amenity' [I]. The production of the ZTV assists in setting the extent of the study, both in landscape, character and visual terms. The ZTV is illustrated at Figure I. The character of the CWDCL land is examined in relation to that of the wider area as identified within Natural England's National Character Areas. The study area lies within NCA 38: Nottingham, Derbyshire



and Yorkshire Coalfield [2].

Local Authorities often undertake landscape character appraisals which add a further layer of detail to that set out within the national areas. Within the recently published Kirklees District Landscape Character Assessment [3], the northern parts of the site fall within Character Area LCA NI: Emley Moor and the southern parts of the site within character area LCA G10: River Dearne Valley.

1.1.2 Landscape and Visual Appraisal

The process has been guided by the third edition of the document 'Guidelines for Landscape and Visual Impact Assessment', published by Landscape Institute with the Institute of Environmental Management and Assessment [4].

'Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity.' Para I.I P4

The two distinct components of LVIA are:

- 'I. Assessment of landscape effects: assess effects on the landscape as a resource in its own right;
- 2. Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.' Para 2.21 P21 [4]

This report separates these elements into two distinct sections so that the differences can be clearly appreciated. In order to satisfy the objective of this study, each section has been set out as follows:

Baseline Analysis - This is an analysis of the existing situation within and surrounding the CWDCL land. It draws upon information gathered during a desk study and field survey work. In relation to the visual amenity section, the area of study (extent of visibility) is also identified and visual receptors are selected and visited. Planning designations intended to protect landscape and visual amenity are also recorded.

Assessment of Landscape and Visual Effects - This part of the study describes the likely nature and scale of changes to landscape character and visual amenity. The proposed development is studied and then compared against the baseline information to ascertain potential effects upon the landscape and visual amenity.

To accompany the description of baseline and assessment information, a series of classifications have been applied to the landscape character of the site and each visual receptor. These act as a summary and place a defined value on; the sensitivity of the character area/visual receptor, the magnitude of change and the subsequent significance of the effect of the development without mitigation.

1.1.3 Sensitivity of Existing Landscape Character/Visual Receptors

The sensitivity of the landscape to change is the degree to which a particular landscape can accommodate changes, or new features without significant detrimental effects to its essential characteristics. The sensitivity of visual receptors will depend on three key factors:

- The receptor's activity whilst exposed to the view (work, recreational activities, resident);
- Degree of exposure to view; and,
- · Period of exposure to view.

The sensitivity of landscape character or a visual receptor is defined as being High/Medium/Low, where High is the most sensitive.

General criteria for establishing the sensitivity of visual receptors and landscape character are set out in the following

Where viewpoint locations have more than one receptor, the impacts for those of greatest anticipated sensitivity will be used to determine the anticipated overall impact magnitude; thus ensuring the worst case scenario is reported.

1.1.4 Magnitude of Change

The magnitude of change is the 'combination of the scale, extent and duration' [5] of the development and its impact on landscape character and visual receptors.

In the case of landscape impacts this relates to:

- The size, extent or degree of change to landscape character or individual landscape features;
- Whether there is a direct impact resulting in the loss of landscape features or a change beyond the land take of the scheme having an impact on the character of the area; and,
- Whether the impact is permanent or temporary.

For visual impact this relates to:

- Degree of change to existing views;
- Distance of the receptor from the application site; and,
- Whether the impact is permanent or temporary.

Where appropriate mitigation is identified which could reduce the magnitude of change to effect upon either visual receptor or upon perceived landscape character and thus reduce the potential overall effect of development in these instances

1.1.5 Heritage Asset Impact

In undertaking this appraisal, several Zones of Theoretical Visibility (ZTVs) have been prepared which illustrate the theoretical visibility from five selected locations within the grounds of Bretton Hall. The assessments have been based upon locations where site work identified visibility towards the CWCDL land.

Computer generated extents of visibility have been produced for each of the following scenarios, at five locations within the grounds of Bretton Hall. and one location within the Bentley Grange site.

- The visibility of the CWDCL land only, but including key areas of woodland which act as a visual barrier.
- · The visibility of 9m high buildings on the site, including key areas of woodland which act as a visual barrier.

Smeeden Foreman have prepared similar appraisals at the request of English Heritage and Historic England which demonstrate the theoretical visibility of the existing site with no development occurring on it so that a comparison can be made between the potential increased visibility of buildings on a site. A building height of 9m represents the scale that would be anticipated from the type of development proposed.

The ZTVs have been generated using LSS software and OS Landform Panorama data.

I.I.6 Green Belt

As part of the development of the Draft Local Plan, Kirklees Council has prepared a Green Belt Review and Outcomes



Report [6] which includes "a review of the green belt edge and the land immediately beyond it to determine the degree of constraint to development and the degree to which land performs a green belt role" section 1.3.3 [6].

In undertaking our appraisal of the Green Belt boundaries in proximity to the CWDCL land, we have reviewed the methodology set out by Kirklees Council within their Draft Local Plan Green Belt Review and Outcomes Report [5] and which we provide for reference at Appendix D.

The general approach taken by Kirklees is to assess the degree of constraint along the Green Belt edge and its relationship between the adjoining Green Belt land. The methodology outlines a series of tests, and are as follows;

- Test I Level of constraint at edge (topographical, physical and environmental)
- Test 2 Degree to which an edge performed a Green Belt role (test included purposes one to four of the Green
- Test 3 Assessed parcels of brownfield land and considered whether the parcels could be recycled, and if they were correctly included within the Green Belt.

The outcomes for Tests I and 3 were graded in colours red, amber, green to illustrate the degree of importance to the role of the Green Belt. Test 2 used a more complex approach and made a distinction between purpose one (preventing merging) with purposes two, three and four (checking unrestricted sprawl, safeguarding the countryside from encroachment, and preserving the setting and special character of historic towns). The outcomes from the assessment of purposes two, three and four were combined in a matrix to give an overall score for those elements. The study by Kirklees places more weight on coalescence and that if the outcome of this test is 'severe' then the other purposes are not considered. The NPPF does not state that any of these purposes hold more weight in relation to the function of the Green Belt.

The Site

1.2.1 Topography

The existing levels on the CWDCL land fall from north west to south east, between approximately 115m and 95m at which point the land is bisected by Wakefield Road, and is bounded to the south by the River Dearne. The land therefore has a south/south easterly facing aspect, with opportunities for views of the opposing valley side towards High Hoyland, which rises to 220m at Winter Hill to the south (refer to Figure 1.5).

The part of the CWDCL land that lies to the south of Wakefield Road is generally level, with few undulations or variations in land form.

The topography of the surrounding area is such that the network of relatively narrow valleys associated with small rivers and springs has created a landscape whereby upper valley sides prohibit views from one valley to the next and development having predominantly occurred within lowers areas, restricts visibility along the length of the valley.

The former iron workings and coal mining industry of the area, although now redundant, has had a lasting effect upon the local topography. Evidence of this can be seen in the form of spoil heaps colonised with vegetation. To the north and north east of the site the distinctive remnants of iron workings can be seen as small mounds within areas of farmland. To the west of the site, beyond Kiln Lane, the spoil heap associated with the former Park Mill colliery is a visible landform and includes tree and scrub vegetation, which screens the site from areas further to the west.

1.2.2 Vegetation

The CWDCL land is surrounded by arable farmland with hedgerows and associated trees. Within the surrounding farmland there are areas of standing water (within a system of ditches), tall ruderal vegetation and broadleaved woodland.

The CWDCL land to the north of Wakefield Road is divided into six fields which are separated by native hedgerows. Trees within this part of the land are few and occur occasionally within the hedges and in a small group isolated within the most southerly of these fields. To the eastern site boundary a small water course, which feeds into the River Dearne at the most easterly part of the site, is flanked by mature trees and divides farmed fields from an area of unmanaged grassland which runs perpendicular to the water course.

Land south of the A636 comprises arable fields, species-poor semi-improved grassland, hedgerows, tall ruderal herb, scattered scrub, bramble scrub and standing water. A hedge, which runs from the northern boundary to the eastern boundary, bisects the site. The site is bound to the south by the River Dearne and to the east by native hedgerows and a ditch system. Beyond the site boundary to the west lies an area of designated common land and a Grade II Listed packhorse bridge.

1.2.3 Boundaries

The boundary of the CWDCL land as shown at Figure 1.1 utilise landscape elements which provide an existing edge against which development could occur and which could provide opportunities to define a strong new Green Belt boundary. The boundaries of the site shown on the draft allocation map (Figure 1.2), generally follow existing landscape pattern and features and replicate those of the CWDCL land with the exception of the northern boundary, where the CWDCD land proposes the utilisation of the existing lane which provides access to Gillcar Farm and which extend along the majority of the northern boundary of the CWDCL land. Beyond this to the north, overhead lines pose future constraint to future encroachment in this direction (refer to Figure 1.6).

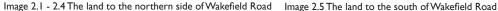
The southern boundary follows the route of the River Dearne, the eastern boundaries are defined by an existing roadway and water course and the western boundary runs along Kiln Lane. To the north however, the Council have set an arbitrary line across several fields which does not utilise field boundaries, or other existing landscape features, and which we would raise concerns over the appropriateness of this boundary in terms of meeting the purposes of the Green Belt.





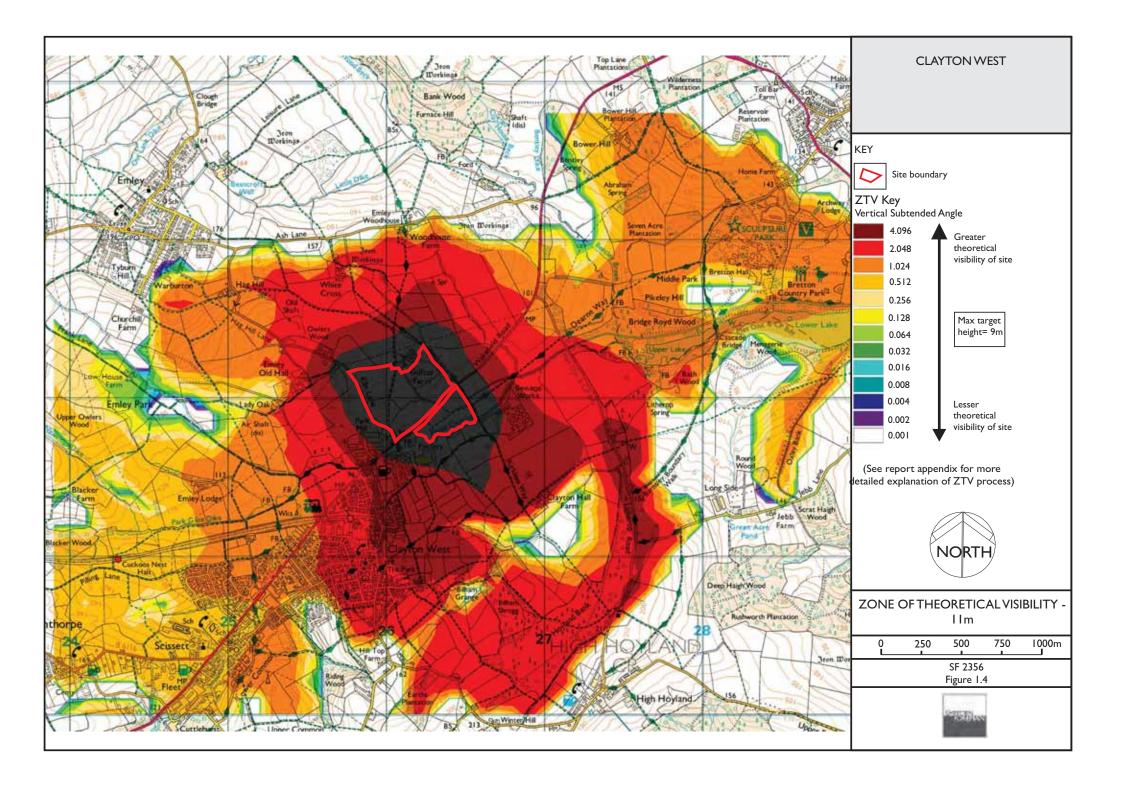


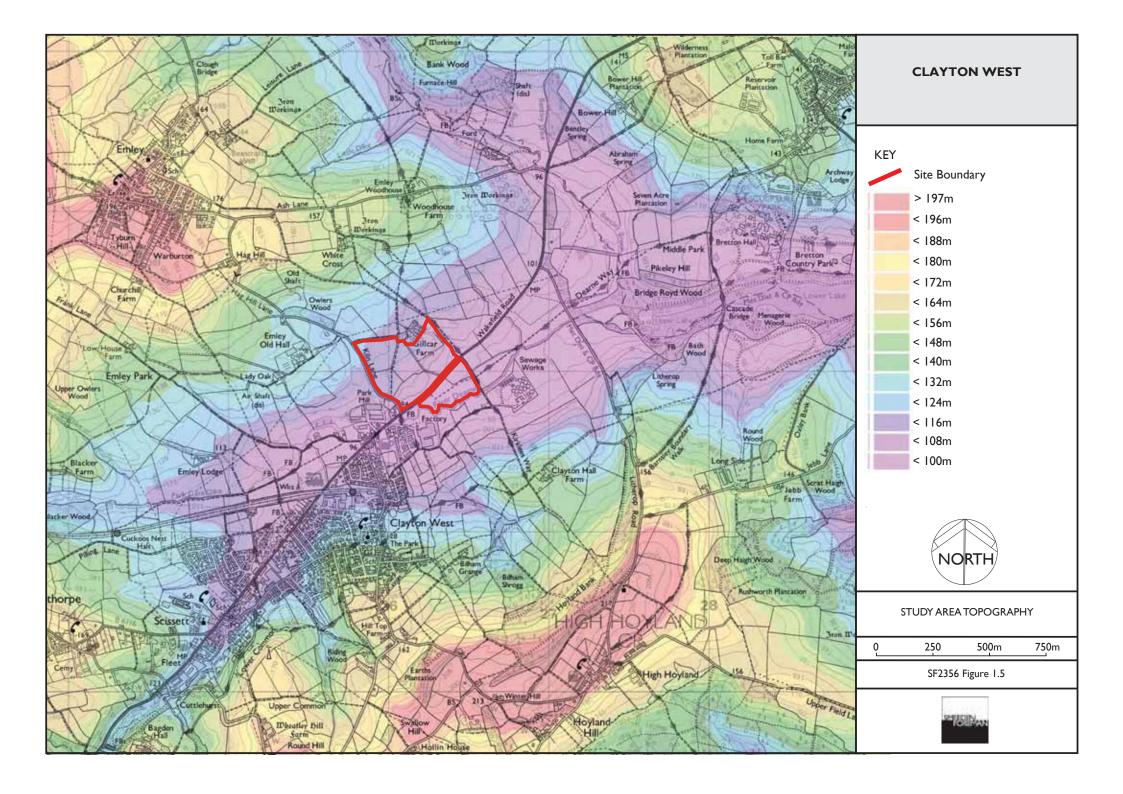












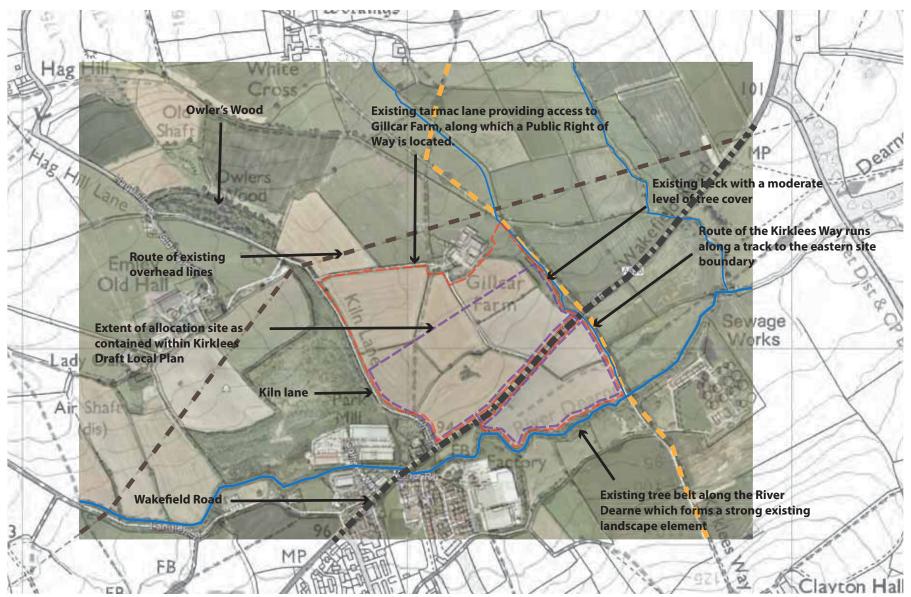


Figure 1.5 Key existing physical and human elements in proximity to the sites



Landscape Character

Landscape Character

Wider Landscape Character

The study area, as previously set out (see section 1.1.1) sits within NCA 38, Nottinghamshire, Derbyshire and Yorkshire Coalfield [21.

Some of the key characteristics of these Character Areas are identified as:

- A low-lying landscape of rolling ridges with rounded sandstone escarpments and large rivers running through broad valleys, underlain by Pennine Coal Measures.
- Local variations in landscape character reflecting variations in underlying geology.
- A mixed pattern of built-up areas, industrial land, pockets of dereliction and farmed open country.
- Small, fragmented remnants of pre-industrial landscapes and more recent creation of semi-natural vegetation, including woodlands, river valley habitats and subsidence flashes, with field boundaries of clipped hedges or fences.
- A strong cultural identity arising from a history of coal mining, steel making and other heavy industry which resulted from the close relationship between underlying geology and resource availability, notably water power, iron ore and coal.
- Many large country houses and estates established by wealthy industrialists in the 18th and 19th centuries and ancient monuments create focal points and important recreational opportunities within the landscape, such as Bretton Hall, Wentworth, Woodhouse Temple Newsam, Nostell Priory, Bolsover Castle and the ruins of Codnor Castle.
- Widespread influence of transport routes, including canals, roads and railways, with ribbon developments emphasising the urban influence in the landscape.
- Continuing development pressure including land renewal and regeneration projects, especially along river corridors and around towns.

Characteristics of the NCA are evident within the study area and it is our assessment that the CWDCL land and surrounding landscape conforms with the characteristics above set out within the character area document.

As previously described, the land comprises agricultural land within the Green Belt designation. 64% of the land within NCA38 is situated within the Green Belt.

Inclusion of new buildings on the CWDCL land providing employment use would reflect the mixed nature of this wider character area which displays industrial remnants, agriculture and settlements of varying size and character residing within an area of narrow valleys. There is variety in both natural and made-made landscape elements which we consider would not be materially altered by the development of either the Council's allocation area or the CWDCL land.

Local Landscape Character

As previously identified, the Kirklees District Landscape Character Assessment [3] identifies areas of local landscape character. The site is located on the cusp of the River Dearne Valley character area (LCA GI0) and Emley Moor character area (LCA NI). The key elements of relevance to the site and the wider study area are set out as follows:

LCA NI:

- Crossed by small dykes and becks, some of which originate on the higher ground within the NCA.
- This area is part of the South Yorkshire Coalfield, with Millstone grit overlain by the mudstone, siltstone and sandstone of the Pennine Coal Measures, with seams rich in coal and iron.
- Frequent woodland cover, with a mixture of broadleaved copses and plantation, although this is generally scattered across the moor and large blocks of woodland are not a common occurrence.
- Woodland is generally found in blocks with straight edges which are coincident with field boundaries. In-field trees are uncommon.

- Mixed field pattern, witht he scale of the fields dictated by the topography of the land. Hedges, post ad wire fencing and gritstone walls enclose the fields.
- Rich coal mining heritage, with pre-historic iron ore mining also being evident within the landscape. There are designated remains of day holes (adits); medieval mines.
- Emley Moor transmitting station is located one mile west of Emley, which at 330m tall is the tallest free standing structure in the UK and is a prominent feature across the district.
- The Kirklees Way crosses through the eastern part of the LCA and goes through Flockton, while there are other locally promoted routes including the Emley Circular Trail and the Emley Village Walk. Pg 62-64 [3]

LCN G10:

- The River Dearne is joined by smaller tributaries including Baildon Dyke, Nine Clogs Dyke and Park Gate Dyke which join the
- A high level of broadleaved woodland cover, particularly on the slopes adjacent to watercourses and to the west of Denby Dale.
- Fields are mostly small scale, forming a variety of regular and irregular patterns.
- Land use also varies; the mix of arable and pastoral fields creating a mosaic of colours and textures which change with the
- An assortment of field boundaries is also evident, with a mixture of hedges, fencing and traditional stone walls.
- The primary settlements in this LCA are Clayton West and Denby Dale, which both grew as a result of the 18th and 19th century coal and textile industries.
- The main road servicing this area is the A636, which runs along the valley floor. This road meets the main A635 west of Denby
- The main valley floor is densely settled and has a peri-urban feel.
- Most of the valley is visually enclosed by the sloping valley sides and the significant woodland cover, although there are some more extensive views to the south over Barnsley District from higher slopes. Pg 50-51 [3].

All three of the local character areas include reference to the Registered Park and Garden of Bretton Hall, which lies to the east of the CWDCL land and is included within LCA G10 and N2, although the majority of the designation falls within Wakefield District.

As set out within our methodology, we have undertaken field work which considers the sensitivity of local landscape character. Image 2.1 View east along Wakefield Road

We consider that surrounding rural landscape (those identified as LCAs NI and N2 [3], within which Clayton West is situated, to be of **medium sensitivity** in that it contains land which is of positive character, with areas of recognisable landscape structure with some elements or features which are visually notable and worthy of conservation (such as Emley Transmitter, key woodland blocks or distinctive field pattern). However the landscape also contains evidence of elements (such as historic industrial land uses and human influence) which act as detractors and result in a landscape of moderate condition with a reasonable sense of place.

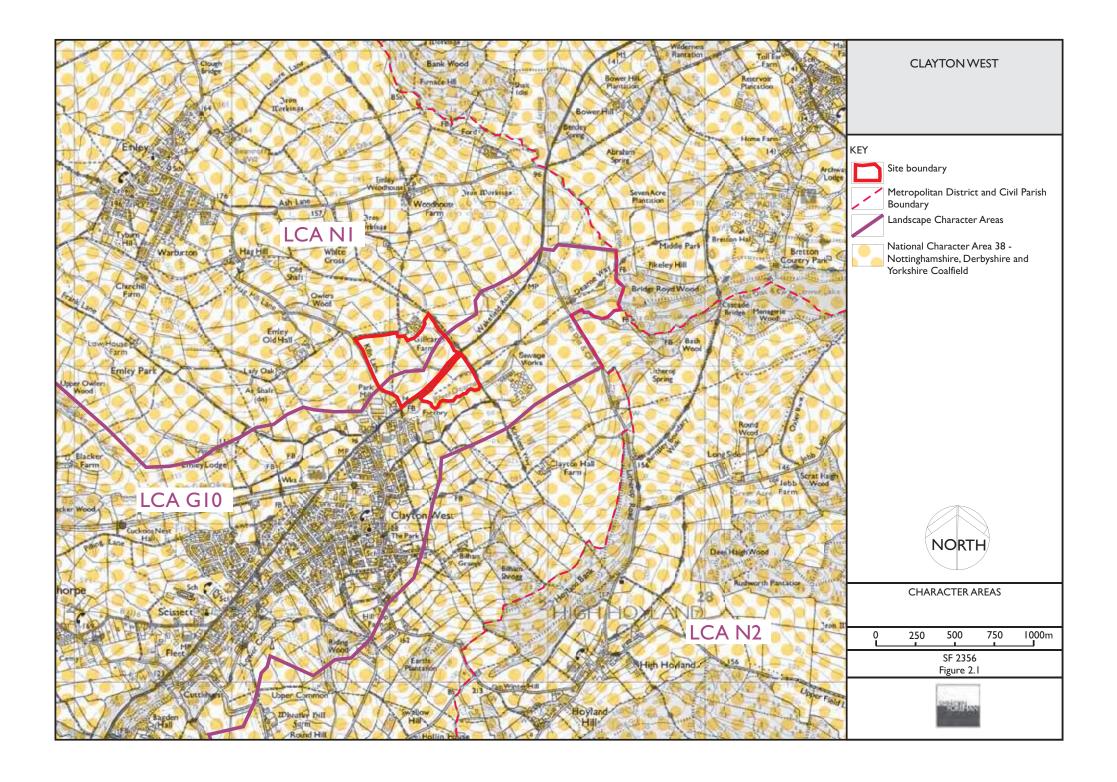
To the east, the parkland landscape of Bretton Hall and which is considered to be of high sensitivity, which is reinforced by it's designation status.





Image 2.2 Clayton West situated within the lower valley landscape





The parkland landscape of Bretton Hall and gardens is very well contained by belts of deciduous and coniferous woodland and undulating land form and also including isolated mature parkland trees. The CWDCL land would be located adjacent to the eastern edge of Clayton West and would reflect the developed nature of the settlement which includes some existing larger scale commercial and industrial buildings. In consideration of the contained nature of the Bretton Park landscape, development of the land is unlikely to have any effect upon this landscape character. Further consideration of potential impacts upon this heritage asset is considered at section 5.0.

While the landscape surrounding the CWDCL land is generally of a positive character, it is not without features which indicate both the former and present mixed land use and acts to demonstrate the changes over time of the demands of the local population. These include the remnants of the iron workings, spoil from past mining operations, the Kirklees Light Railway, (which historically acted to serve the demands of the two collieries in the area and which now operates as a visitor attraction) and new development within Clayton West interspersed with mill buildings now housing new businesses. Image 2.1 shows the view east, towards the site along Wakefield Road and includes mill buildings, and new development in the form of the petrol station and the railway bridge which crosses the road in the distance. While much of the housing within Clayton West is located rising up the southern valley side, the urban areas appear conjoined with Scissett to the west and is percieved as a linear settlement, with businesses and industry situated in the lower valley areas in proximity to Wakefield Road and the River Dearne.

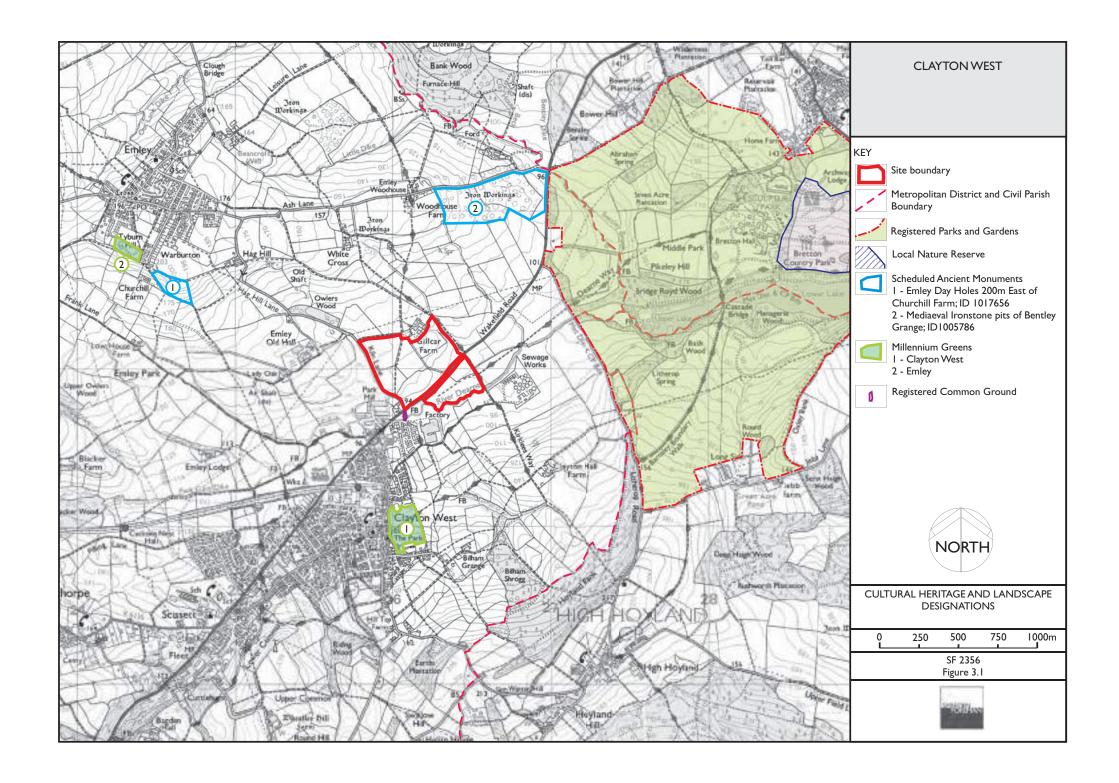
While it is acknowledged that the green field land to the periphery of Clayton West (Image 2.2) and other outlying settlements is of a positive character, development of the CWDCL land would continue the existing urban form along Wakefield Road, continuing the linear form of the existing settlements along the valley and partially up the northern valley side.

Larger buildings in the form of former mills and more recent industrial and commercial development is located predominantly within the valley floor of Clayton West near key transport routes and the water source of the River Dearne. Smaller scale buildings extend up the sides of the valley, with intermittent larger scale buildings occurring at farms.

We recommend that development of the CWDCL land should respond to the principle set out above, whereby larger buildings occupy lower areas and reduce in height and scale with elevation. Such an approach would assist in the assimilation of development into the wider, existing, settlement pattern.







3.0 Other Applicable Statutory and Non Statutory Landscape Designations and Classifications

3.1 Local Nature Reserve (LNR) and Local Wildlife Site (LWS)

Part of the study area encompasses land that is designated as a Local Nature Reserve of Bretton Country Park and Bretton Lakes LWS. These areas are located approximately 2.15km and 760m to the east of the site respectively. Development of the CWDCL land would not have any direct impact upon these designations and potential impacts would relate to landscape character (as previously discussed) and key views (see section 5.0).

3.2 Scheduled Ancient Monuments

There are two designated Scheduled Ancient Monuments (SAMs) within the study area, as shown on Figure 3.1. Both sites relate to past coal and iron mining.

Development of the CWDCL land is not considered to have a direct impact upon these sites in respect to landscape or visual impacts due to the distance from the development and the extent of intervention by landscape elements and topography. Further assessment work has been undertaken in relation to the Bentley Ironworks and this is contained at section 5.3.

3.3 Listed buildings

There are no listed buildings or structures within the CWDCL land. To the south of the land are two listed bridges (70m) and properties at 3-4 Manor Road (110m) and to the north the farmhouse and farm buildings at White Cross Farm (600m) are Grade II listed. Listed buildings within the study area are shown on Image 3.2.

No direct impact upon the reasons for the listings are anticipated as a result of development of the land. In undertaking site work, we consider that development of the allocation site or the CWDCL land would not impact upon the reasons for their designations.

3.4 Registered Parks and Gardens

There is one Registered Park and Garden within the study area. This is that of Bretton Hall to the east of the site, as outlined on Figure 3. Further, more detailed appraisal has been undertaken of the potential impact upon this designation as a result of the development of the land (see section 5.0).

3.5 Tree Preservation Orders

Kirklees Council online mapping shows that none of the trees within, or adjacent to the site are subject to Tree Preservation orders (http://map.kirklees.gov.uk/treepreservationorders/Map accessed 09/12/2015).

3.6 Public Rights of Way (PROW)

There are two Public Rights of Way which follow routes within the CWDCL land and the proposed allocation site. These could be affected through development of the allocation site or the CWDCL land. The locations of Public Rights of Way within the study area are shown on Figure 4.1.



Image 3.2 Listed Buildings (taken from http://list.english-heritage.org.uk, accessed 18/12/2014

Public Right of Way (Ref DEN 14/10) follows a route within from Gillcar Farm to the south western corner of the land where it emerges on Kiln Lane. In consideration of the sloping topography at this location it would be anticipated that the route of this PROW would be diverted. While a change to the nature of the route would occur, the present connection with Kiln Lane provides no pedestrian pavement near the junction between Kiln Land and Wakefield Road and a diversion could provide a safer connection of a similar distance, to Wakefield Road and the amenities beyond.

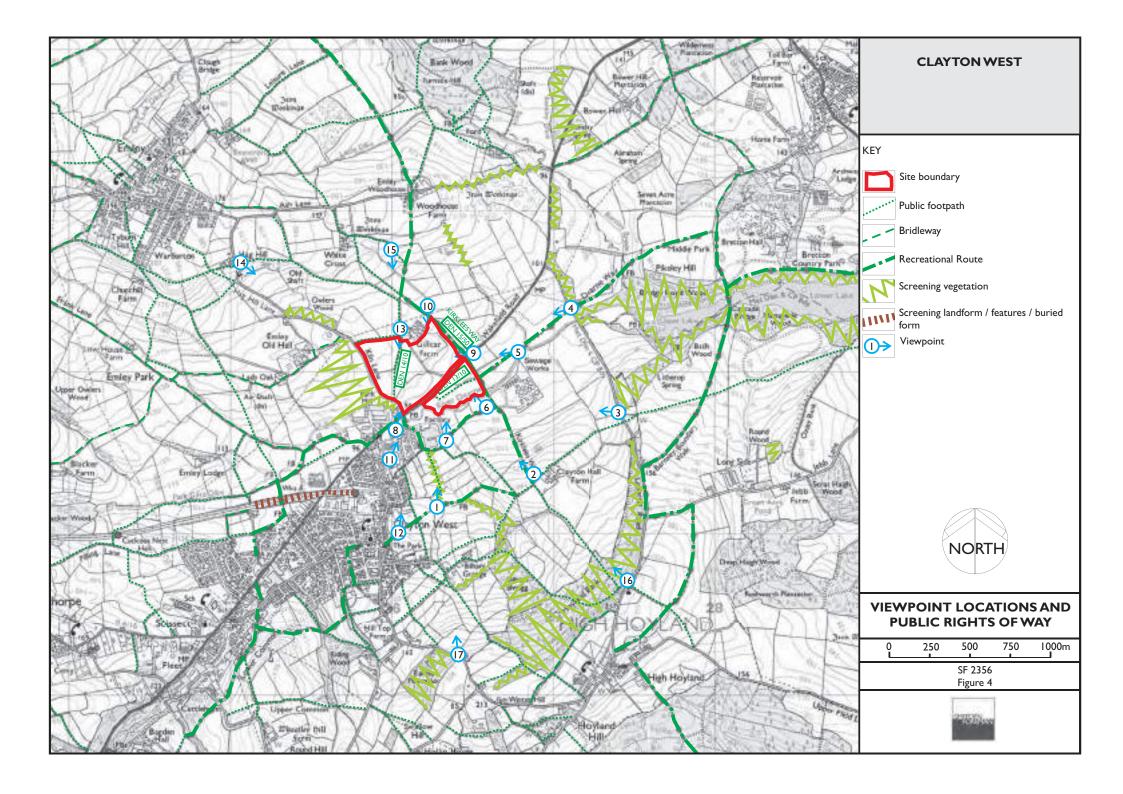
Right of Way DEN 13/10 is located within the southern part of the site and provides a link between the lane that leads to Clayton Hall Farm, and Wakefield Road. There could be potential to divert this route along the most southerly boundary adjacent to the River Dearne. While new development would be visible to the north, through detailed design of these most southerly parts of the site, a diverted route has the potential to offer an improvement to the condition and quality of the route. There would be the potential to connect the route with the existing community landscape which is located beyond the site to the west.

Right of Way (Ref DEN 101/10 runs along the access drive which leads from Kiln Lane to Gillcar Farm. Development of the site could take place without direct impact upon this route. Visual impacts upon Public Rights of Way are outlined in section 4.0

Users of public rights of way were considered at the majority of viewpoint locations within the study area. Please refer to section 4.0.







4.0 Visual Amenity

Visual amenity is influenced by two factors. Firstly the sensitivity of the users of a particular visual receptor to changes in the view. This depends upon their immediate environment, and their activity. Guidance and the methodology followed is set out at section 1.1.1.

The second element to consider is the magnitude of change within the landscape. This is the difference between existing conditions and those proposed.

The combination of these factors and the potential for immediate or longer term mitigation can be judged and an opinion made as to the immediate and longer term potential impacts from development and their significance.

Through desk and field based study, fifteen receptor locations were identified as having the potential to experience a visual change as a result of development within the site (either the allocation site or the CWDCL land). Figure 4 shows key viewpoints which have been visited during this site assessment. It is the intention that these may be subject to further detailed analysis forming part of a full LVIA, and at such point final viewpoint locations would be agreed with the Planning Authority.

4.1 Local Views

Local views (those from within approximately 600m of the site) are varied both with respect to the type of receptor, the nature of the existing views and the extent to which the land is visible. As illustrated on Figure 4, visibility of the land from areas to the west is afforded a significant level of screening by land form and intervening buildings to the extent that with the exception of very local receptors (within approximately 100-150m) development occurring within the CWDCL land would not be discernible. Although running adjacent to the western boundary, views from Kiln Lane into or across the site for motorists are not available due to the enclosed nature of the road with tall hedges and a bank which forms the boundary in this location.

Residents with relatively local views are principally farm houses (considered at Viewpoints 2 and 15: Images 4.1 and 4.2) or a few properties orientated towards Wakefield Road within a modern housing development at Whinmoor Drive (Viewpoint 8: Image 4.3). Views towards the CWDCL land from other residential areas of Clayton West are afforded screening by other buildings and landscape, as illustrated in Image 4.4 at Viewpoint 11 and Image 4.5 at Viewpoint 12, the Millennium Green.

- There are two residences located on Whinmoor Drive, approximately 95m from the site, with direct views of the part of the site to the north of Wakefield Road. Views may be possible from principal rooms within the property. The existing conditions are such that at present views principally extend towards the property located to the northern side of Wakefield Road across a small area of designated common land and a Grade II listed bridge. There is some intervention in views in the form of trees and the extent of the land that is visible is restricted by these trees and the orientation of receptors, to part of the most southerly field.
- With the exception of the farmhouse at Gillcar Farm, most other receptors in very close proximity to the CWDCL land are users of the Public Rights of Way in the area, several of which run within and alongside the land and include the Kirklees Way which runs along the eastern boundary and also motorists travelling through the site on Wakefield Road. The farm house at Gillcar Farm has a narrow field of view towards the land and experiences some screening by farm buildings and vegetation. Users of the public footpath DEN 14/10 would experience a change to the type of landscape through which they are moving; one of a rural nature to one of a developed character. This may not be dissimilar to other footpaths within the area where they transition between rural and urban areas, such at that experienced at Viewpoint number 7 where the Dearne Way passes next to an existing large scale factory. Development of the land would constitute an extension of other urban land uses which exist in this area; the factory building to the south is highly visible throughout the surrounding area and other commercial, employment and

residential land use occurs along Wakefield road which the development of the land would extend further to the east, but may not be inappropriate subject to detailed consideration of scale and massing within it.

- As noted above, receptors at Viewpoint 7, and to a degree, Viewpoint 6 on the route of the Dearne Way, experience a transition between the urban edge of Clayton West and the wider landscape. At these locations, the route follows a narrow path along the edge of a field. The quality of the landscape is moderate and views are relatively contained by trees and hedges in the valley bottom. While the Sewerage Works to the east of the site aren't highly visible from more distant locations, receptors are aware of this infrastructure as they pass through this area.
- Numbers 6, 7, 9, 10 and 13 are located on Public Rights of Way, with 9, 10 and 13 situated adjacent to the site. As
 would be expected, development of the land would appear to be a new element within views of these receptors,
 although existing trees located along the River Dearne and also along the site's eastern boundary act to filter views.

4.2 Wider Views

More distant views are predominantly from Public Rights of Way, with a few isolated residences. Generally these locations are on more elevated valley sides, with the exception of Viewpoints 4 and 5 which follow the Dearne Way along the valley bottom.

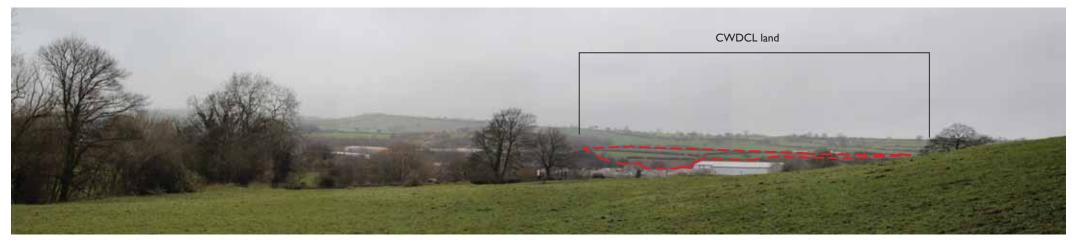
- Viewpoints 4 and 5 are located along the Dearne Way recreational route from the point at which the path leaves the grounds of Bretton Park and continues west towards the CWDCL land and Clayton West. At Viewpoint 4 the CWCDL land is largely obscured by intervening vegetation and land form. As receptors travel east the CWDCL land located south of Wakefield Road is afforded good screening by trees located along the river. The fields adjacent to Wakefield Road to the north become more visible as receptors move west. The green roof of buildings at Park Mill are discernible and development of the land would comprise a perceivable increase in the built form within existing views, although views would be filtered by intervening vegetation and development of the land would have little impact upon other key elements within the landscape. Careful siting, scale and material choices would be beneficial to lessen the appearance of development within the landscape.
- There are a network of Public Rights of way which extend from the CWDCL land to the north, towards a ridge at Ash Lane and also to the south towards a ridge at Litherop Road. These two ridges denote the extent to which development within the CWDCL land has the potential to be visible in these directions. Viewpoint 2 on the Kirklees Way at Clayton Hall Farm considers the change which may be visible from users of this Right of Way; residents of one property at the farm, and users of rights of way further to the south. Viewpoint 3 to the east is representative of views for residents of a further dwelling with views along the Dearne Valley towards the site. Views are generally broad and feature Emley Moor Transmitter on the horizon to the north west. Much of the village of Clayton West is obscured by land form and only the lower, most easterly extents feature within views. Views also include larger buildings of the existing factory and units within Park Mill. Excepting this, the view is of a rural nature and development of the site would comprise a notable increase to the extent of built form within the view. Development should respond to the character of the local area and careful consideration of scale, massing and materials would be necessary to minimise the impacts upon these views.
- From elevated areas to the north, the CWDCL land is largely obscured. There is little opportunity for views from roads or properties at Emley Woodhouse or Hag Hill due to topography and boundary walls and hedges which prohibit views. Viewpoints 14 and 15 illustrate the nature of views where gaps in vegetation permit. These are from Public Rights of Way at locations where open views are afforded. Viewpoint 15 also reflects the view from the adjacent farm house. From these areas the built form of Clayton West is a more prominent element within views and the mixture of large scale buildings and residential areas is evident. The farm buildings at Gillcar Farm are visible within the middle ground and development within the CWDCL land would be seen adjacent and beyond these, although much of the land would be invisible as the site drops away to the south. Development of the CWDCL land would result in the edge of Clayton West appearing closer to the receptor. It is recommended that the scale, materials and height of new buildings be reflective of that of the Gillcar Farm buildings and an opportunity to provide



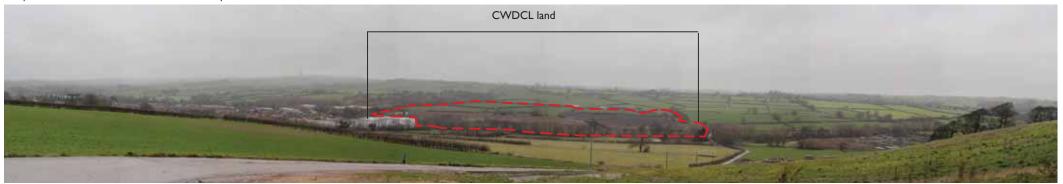
new tree planting to the peripheral areas of the land should be considered which would assist in integrating the new buildings into the wider landscape.

• Development of the site may be visible within views from some distant locations such as a residence at Viewpoint location 17, however from this elevated location views are broad and extend to the north west and north east. The settlement of Clayton West appears among trees within the lower middle ground. Development within the site would be discernible and would be seen set behind the existing built form of other parts of the village and would comprise a visible change within the view. However it is considered that due to the distance of the receptor and the extent of existing views, development which responds to the character of the area may have a minor impact upon these receptors.





Viewpoint Location 1 - View north from the Kirklees Way.



Viewpoint Location 2 - Kirklees Way and residence at Clayton Hall Farm



Viewpoint Location 3 - Public Right of Way at Litherop Road



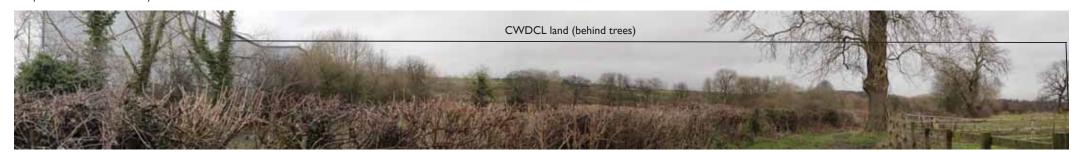
Viewpoint Location 4 - Dearne Way east of the CWDCL land



Viewpoint Location 5 - Dearne Way east of the CWDCL land



Viewpoint Location 6 - Dearne Way south of the CWDCL land



Viewpoint Location 7 - Dearne Way south of the CWDCL land





Viewpoint Location 8 - View from residential properties on Whinmoor Drive



Viewpoint Location 9 - Kirklees Way/ Wakefield Road looking west at the boundary of the CWDCL land and the Council allocation site



Kirklees Way adjacent to the eastern boundary of the CWDCL land and the Council allocation site



Viewpoint Location 10 - Kirklees Way adjacent to the northern boundary of the CWDCL land





Viewpoint Location 11 - Clayton West cricket ground



Viewpoint Location 12 - View towards the CWDCL land from the Millennium Green

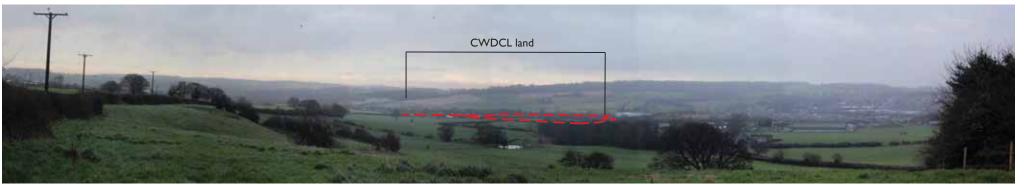


Viewpoint Location 12 - View south (away from the site) from the Millennium Green



Viewpoint Location 13 - Public Right of Way at Gillcar Farm at the northern boundary of the CWDCL land





Viewpoint Location 14 - Public Right of Way at Hag Hill



Viewpoint Location 15 - Public Right of Way near White Cross iron workings



Viewpoint Location 16 - St. Deny's Church



Viewpoint Location 17 - Rear of residential property on Bank End Lane





Heritage Assets

5.0 Heritage Assets

5.1 Introduction

Smeeden Foreman Ltd have been appointed to consider potential impacts upon the Scheduled Monument of Bentley Grange ironstone pits and the Registered Park and Garden of Bretton Hall that may arise from the development of land within the Council's draft allocation (see Figure 5.1 below) and the CWDCL land. The location of the various viewpoints relative to the heritage assets and the CWDCL land is shown at Figure 5.2.

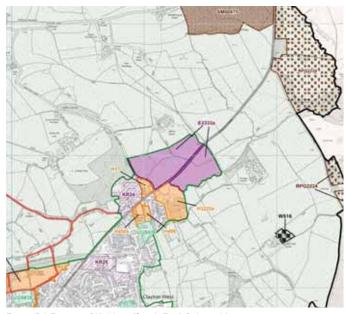
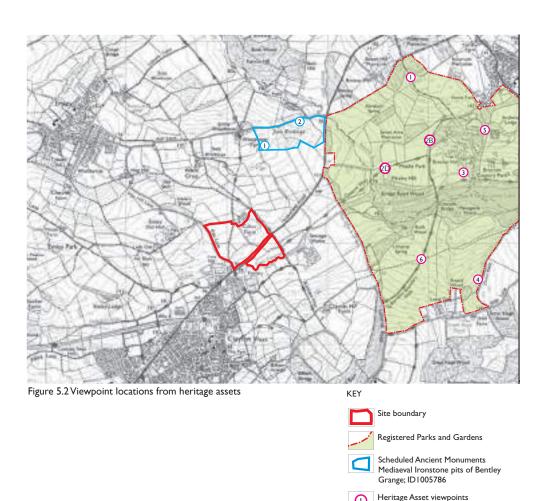


Figure 5.1 Extract of Kirklees (South East) Policies Map

Meetings have been held with representatives of Historic England and also the Conservation and Design Officer for Wakefield District Council, within which district Bretton Hall is located. A meeting took place within the grounds of Bretton Hall and several viewpoint locations were visited, including access within the principal building. The visit corroborated the findings of earlier appraisal and technical work, within which it was identified that much of the grounds in proximity to the Hall, and Bretton Hall itself, would be unaffected by development of the site. We include additional photography from within Bretton Hall which supports this. The representatives from Historic England and Wakefield DC confirmed that no further appraisal or technical interrogation would be required from the Hall, or the Cascade Bridge.

It was agreed that additional appraisal work would be undertaken at a more westerly location on the Dearne Way (Viewpoint 2D) and also that further interrogation of the benefits which would be afforded through the implementation of on site mitigation (which is further set out at Section 7) which would assist in establishing the potential residual visual effect upon locations where some visibility could occur. In each instance where there is potential for a 9m high building to be visible within the site, new tree planting which could from part of the development of the CWDCL site, has been modelled and



the ZTV tested to illustrate the extent to which development within the site could be screened over time.

(1)

New landscape within the CWDCL site in the form of tree belts dividing the development plataeus has been modelled at 13m in height which is an average height which could be expected for tree species such as birch, alder and sycamore at ages of between 15 to 20 years, but which would achieve greater heights at maturity (up to and potentiall exceeding 20m). The technical work undertaken to test the effect which this landscape may have upon the potential visibility of development within the site based upon existing site levels and does not take into account the engineering of site levels required to achieve level development plateaus. Such level changes are illustrated within the cross sections prepared at Figures 7.1 and 7.2.



Viewpoint Location Plan





Image 5.1

This viewpoint is located on a restricted byway (ref: RST BWY 9 West Bretton) follows a route broadly north west - south east which is generally perpendicular to the location of the CWDCL land. Opportunities for visibility towards the land are greatest when travelling in this direction.

This viewpoint is situated at an elevated location within the most northern area of the grounds of the park. The landscape within the park at this point includes mixed evergreen and deciduous plantations, and which frequently define the peripheral areas of the park. To the east of the right of way isolated mature trees contribute to the parkland landscape. To the west of the right of way, as the land drops towards Wakefield Road, trees are located within belts of

woodland plantation and views above these extend to the south west where the woodland on Hoyland Bank is prominent on the horizon. To the south the parkland landscape extends up the opposite valley side.

To the west, within the lower Dearne Valley, the settlement of Clayton West is visible set within trees. The upper parts of a factory located to the south of the River Dearne is visible beyond the tree-lined river. In the direction of the site there is a strong pattern formed by field hedgerows, beyond which the site is situated.

Although as illustrated in the ZTVs the CWDCL land is visible, development occurring within it would form part of wider views available at this location and would be seen within the existing context of the edge of Clayton West. It is considered that although a change could be appreciated there would remain a strong sense of separation between the parkland landscape and the redefined edge of Clayton West and which may not present any harm to the setting of this heritage asset

New tree planting within the CWDCL land (Figure 5.3) would assist in assimilating development into the wider landscape. When trees mature (potential heights of 13 - 20m), buildings within the site would be well screened and the new tree belts would appear in keeping with the wider landscape character.

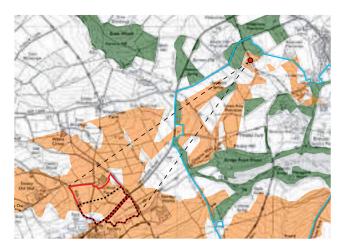


Figure 5.1 Zone of theoretical visibility of ground level

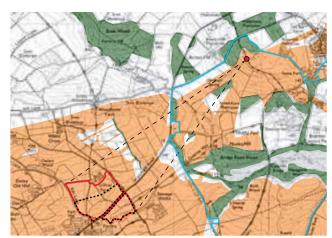


Figure 5.2 Zone of theoretical visibility of 9m buildings



Figure 5.3 Zone of theoretical visibility of 9m buildings and on site mitigation at 13m height.

Receptor height:





CWDCL site boundary



Kirklees proposed allocation boundary

Areas of theoretical visibility



Key screen vegetation at 13m heights

Bretton Park boundary



Target development height:

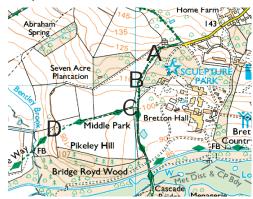


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Viewpoint Location Plan



The heritage asset comprises several elements of varying character; the areas in proximity to Bretton Hall contain a high proportion of mature parkland trees and swathes of woodland which significantly contain the setting of the Hall and focus views from the building across the valley to the south. The bridleway along which this assessment is made follows a route along the outer edge of trees that define the more formal grounds within which the Yorkshire Sculpture Park is situated (Ref: BRDLWAY 7 West Bretton).

Images 5.2 to 5.4 show the way in which visibility changes along this part of the bridleway. The ZTVs produced at Figures 5.3 and 5.5 are from location B. Our site work concurs with the illustrated partial visibility of the site afforded from this location, although views are significantly channelled by trees and woodland in proximity to the route.

There is a distinct change in character at this location with the park. The landscape to the east is of dense woodland associated with the parkland and the land to the west is reflective of the wider farmland character and while being of high quality, the parkland aesthetic which is observed in closer proximity to Bretton Hall itself is largely absent at this location.

Views extend towards Clayton West and Scissett, parts of which are visible extending up the valley sides and where development occurs on higher areas of land. On the horizon numerous wind turbines are visible. The factory adjacent to the River Dearne and the low rooflines of buildings within Park Mill to the south west of the site are discernible and overall the landscape elements visible within views are mixed, but are generally of high quality where settlement and urban form is seen within the wider agricultural landscape.

Due to the transitory nature of receptors along the right of way and some intervention provided by existing tree belts, anticipated visibility is limited to this section of the right of way.

Where receptors are located on higher ground, increased visibility is afforded, however development occurring within the land would appear below the level of the receptor and within the context of the broader views obtained through the increased elevation of receptors. As the elevation of the PROW reduces, views become more focussed upon the landscape in closer proximity to receptors (Image 5.4 on page 36).

Where visibility does occur, new buildings within the CWDCL land would be distinguishable in the distance and but we consider that the change to views would be limited, to the extent that it would not harm the setting of the designation or reason for it's designation. Figure 5.6 shows the ZTV which models potential new landscape within the CWDCL site and the effect this may have on potential visibility of new buildings.

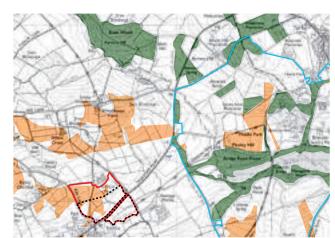


Figure 5.4 Zone of theoretical visibility of ground level

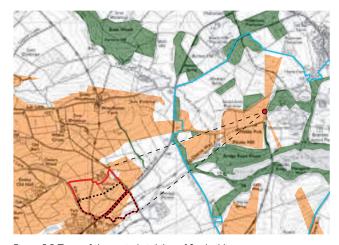


Figure 5.5 Zone of theoretical visibility of 9m buildings

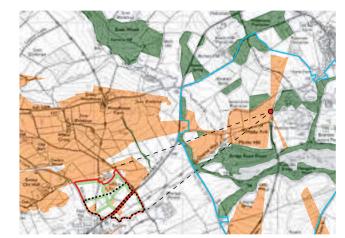
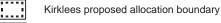


Figure 5.6 Zone of theoretical visibility of 9m buildings and on site mitigation at 13m height.





CWDCL site boundary



Areas of theoretical visibility



Key screen vegetation at 13m heights



On site planting Modelled at 13m

Bretton Park boundary

Target development height:



9m





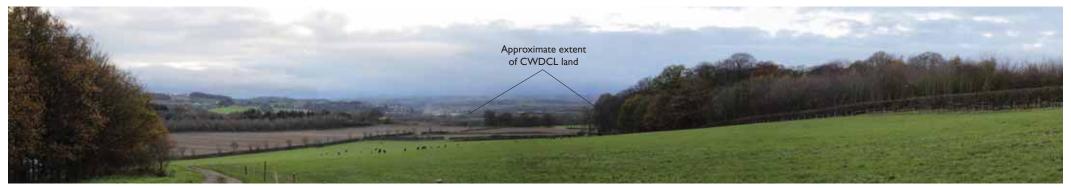


Image 5.2 View south west from location A on the image location plan at Figure 5.4



Image 5.3 View south west from location B on the image location plan at Figure 5.4



Image 5.4 View south west from location C on the image location plan at Figure 5.4

Viewpoint Location 02D



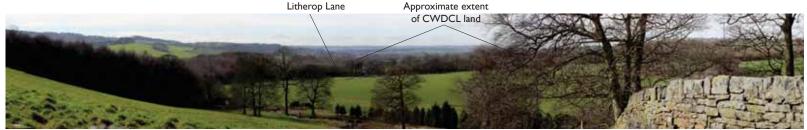


Image 5.5 View from location 2D on the Dearne Way

Viewpoint location 2D is located west of location 2C (Image 5.4), at the point where the Dearne Way (Public Footpath) crosses a stile at the top of a west facing valley side, I.28km from the site and at an elevation of approximately I05m AOD. At this location the land drops steeply towards the Bentley Brook. The site is located within the line of sight as receptors travel in a westerly direction and much of the peripheral landscape is comprised of woodland blocks with occasional trees located along the brook. The series of ZTVs at Figures 5.7 to 5.9 show the limited visibility of the farmland within the site and this is reinforced by filtered visibility of the site through the existing belt of trees as shown within the image at 5.5. Though new buildings within the site would be visible, the existing woodland located along Litherop Lane will provide screening of the lower parts of buildings. Where roofs of new buildings would be visible, this would be seen within the context of the existing factory building located to the south of Wakefield Road and the buildings located within Colliers Way, visibility of which may be obscured by development occurring within the site.

The ZTV at Figure 5.9 tests the additional screening benefits which could be afforded by new landscape within the CWDCL site. This illustrates the extent to which new tree planting would obscure new buildings. The effect of which would be emphasised by the comparible elevation of the receptors at location 2D and that of the site, which extends from 90m to 115m AOD and whereby, through the creation of plateaus, new buildings would be set at a lower level than existing, and which may further minimise the extent to which roofs could be determined from this location. Within the context of this view, which includes the existing settlement of Clayton West, the extent to which a change would be appreciated is restricted by existing and new landscape. The potential residual change is not considered to be of such prominence that the impact upon the heritage asset should preclude development.

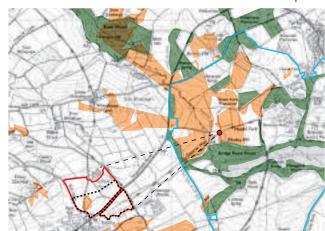


Figure 5.7 Zone of theoretical visibility of ground level

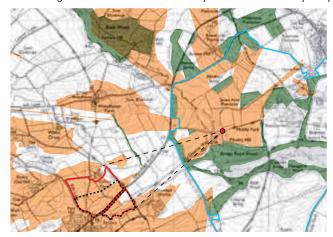


Figure 5.8 Zone of theoretical visibility of 9m buildings

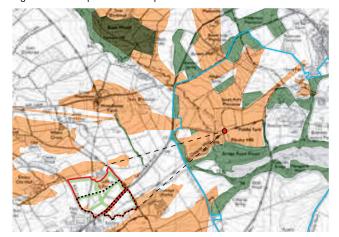


Figure 5.9 Zone of theoretical visibility of 9m buildings and on site mitigation at 13m height.



CWDCL site boundary

Kirklees proposed allocation boundary

Areas of theoretical visibility



Key screen vegetation at 13m heights

Bretton Park boundary

On site planting Modelled at 13m

Target development height:









Image 5.6 Panoramic view from the grounds within the Yorkshire Sculpture Park to the south of Bretton Hall

From this location to the southern elevation of Bretton Hall, much of the views extend across the parkland landscape within the extent of this designation. An exception lies where a distant view extends to the urban areas of Kexbrough in the distant south east and where there exists visibility of existing large scale buildings within the distant landscape.

While views extend to the opposite valley side, the presence of trees which surround the house and lake channel views across the valley and also act to divide the foreground from the distant areas of the park to the south of the lakes.

Following consultation responses from Historic England which queried whether there would be likely to be visibility of the proposed development from upper storey rooms within Bretton Hall, a further site visit was undertaken. The visit, which included representatives from Historic England, enabled the building to be accessed. The image at 5.7 illustrates the nature of views extending from within these rooms. The series of panoramas at images 5.9 to 5.11 show views from the west-facing windows and the way in which the woodland landscape which surrounds the hall acts to focus views within the grounds of the hertige asset. There is just enough elevation from the second storey (Image 5.9), to facilitate views towards Emley and the transmitter at 255m AOD. The site, located at 90m to 115m AOD, and development occurring within it, would be well screened by interviening landscape.

There would be no impact upon views arising from the development of the CWDCL land.



Viewpoint location



Image 5.8 Bretton Hall southern elevation.



Image 5.7 View within the principal first floor room of Bretton Hall.



Figure 5.10 Zone of theoretical visibility of ground level



Figure 5.11 Zone of theoretical visibility of 9m buildings





Image 5.9 Panoramic view from west facing windows on the second floor of Bretton Hall



Image 5.10 Panoramic view from west facing windows on the first floor of Bretton Hall



Image 5.11 Panoramic view from the terrace of Bretton Hall





Image 5.12 View towards the site (west) from Cascade Bridge (Listed Structure).

The Historic England consultee response queried whether any impact would arise from the development of the site upon views from the Cascade Bridge located within the grounds of Bretton Park. During the meeting at Bretton Park in March 2017, this location was visited. Image 5.12 shows the view in the direction of the site from the bridge. The woodland which surrounds the lake offers a high level of enclosure and significantly restricts views beyond this part of the hertiage asset. It was acknowledged during the site visit that proposed development of the site would not impact upon views from this area of the park. No further technical or appraisal work is required from this location.



Viewpoint location



Image 5.13 View towards Bretton Hall (north east) from Cascade Bridge.



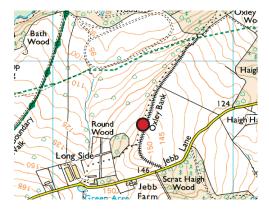




Image 5.14 View west from Oxley Bank

Oxley Bank is a ridge which forms part of the eastern boundary extent of the Registered Park and Garden (as shown at Figure 3.1). Much of the grounds of the park to the south of the lakes are shown as being beyond the areas within which there could be theoretical visibility, however there is very small potential for visibility of buildings within the site from Oxley Bank.

The foreground within the view extends to the north west across much of the landscape of Bretton Hall, with dense

wooded areas and isolated parkland trees comprising key elements of the view. Buildings are few and are mainly those within the grounds of Bretton Hall. Distant views extend north west and the Grade II Listed transmitter at Emley, which stands at over 330m in height, is prominent on the horizon to the west.

As shown at Image 5.14, although views from the length of Oxley Bank predominantly extend to the west, towards the Site, the ridge upon which Litherop Road is located, provides screening to areas of the lower valley within which the CWDCL land is located. Screening is compounded by the woodland belts located within the western parts of the estate. Figures 5.12 and 5.13 are considered to be a good representation of the anticipated lack of visibility of development of the land which could occur and we don't consider that development of the land would impact upon views, setting or character from this area of the heritage asset.

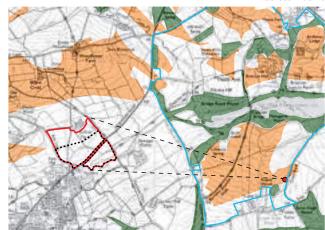


Figure 5.12 Zone of theoretical visibility of ground level



Figure 5.13 Zone of theoretical visibility of 9m buildings



Figure 5.14 Zone of theoretical visibility of 9m buildings and on site mitigation at 13m height.



CWDCL site boundary

Kirklees proposed allocation boundary

Areas of theoretical visibility



Key screen vegetation at 13m heights

Bretton Park boundary

On site planting Modelled at 13m

Target development height:





Viewpoint Location Plan





Image 5.15

A narrow view is available from a limited area of the Yorkshire Sculpture Park visitor centre and adjacent landscape. There are very limited opportunities for distant views from the visitor centre of the Yorkshire Sculpture Park which is located within the grounds of Bretton Hall. Despite the elevated nature of some areas of the park, the location from which the Image at 5.15 above is taken was available from the path which connects the main visitor centre with the Bothy Gallery and is at a distance of approximately 2.3km from the CWDCL land at its nearest point.

The landscape in proximity to the visitor centre and galleries and gardens in these parts of the park contain a large number of mature parkland trees which prevent distant views from many of these areas.

Some visibility is afforded where there is variation in tree heights and where these occur views extend across the park

towards Hoyland Bank in the south and, as shown at Image 5.15, towards Clayton West.

Although views towards the CWDCL land are afforded and development occurring within the land could be discernible, the opportunity for these views is very limited and it is not considered that the change within the view would be of detriment to the experience of receptors or impact upon the heritage asset due to the distance of the site in combination with the prevalence of other elements and features within both the foreground and middle ground which are the main focus within views. New tree planting within the site will bolster the effect of the screening which exists in proximity to receptors and

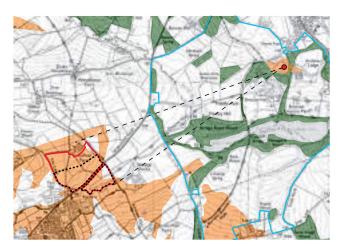


Figure 5.1 Zone of theoretical visibility of ground level



Figure 5.2 Zone of theoretical visibility of 9m buildings



Figure 5.3 Zone of theoretical visibility of 9m buildings and on site mitigation at 13m height.





CWDCL site boundary



Areas of theoretical visibility

Kirklees proposed allocation boundary



Key screen vegetation at 13m heights



Bretton Park boundary

On site planting Modelled at 13m









Bretton Hall

Viewpoint Location 06



Image 5.16 View to the west from the route of the Barnsley Boundary Walk

This viewpoint is located to the southern part of the designation on the route of the Barnsley Boundary Walk, which is a local recreational route which broadly circumnavigates the Barnsley District and which passes through the designated parkland landscape of Bretton Hall at a distance of approximately I.Ikm from the CWDCL land at its nearest point.

The extent of mixed woodland to the periphery of the designated area prohibits views for much of the route within the designation. The local topography to the west is also restrictive to views in the direction of the site.

Image 5.8 above is located at part of the route which experiences a relatively open aspect. Views extend principally to the north towards the River Dearne and the woodland-flanked lakes which lie south of Bretton Hall. Mature woodland copses which occur in proximity to receptors on this route form distinct elements which prohibit and channel views, as shown in the view from Image 5.8.

The opportunity for a view towards the CWDCL land is limited and would theoretically occur for a short section of the footpath where a gap between woodland located along Litherop Lane could facilitate a narrow view. However, as this would be perpendicular to the direction of travel, it is unlikely that visibility of development would be appreciated from this distance and intervening landscape elements create a strong propensity for views in other directions.



5.3 Bentley Grange Medieval Ironstone Pits

Viewpoint Locations 01 and 02



Image 5.9 View east from location 01



Image 5.10 View west from Location 01

The area of the designation extends from a distance of approximately 700m to 1.1km from the CWDCL land at its nearest point.

There is very limited opportunity for visibility from the area of this designation. The local topography and the nature of the bell pit landscape prohibit views towards the CWDCL land from much of the area. Existing hedges and trees filter views from the most south western corner of the site, however there is some likelihood that from a very limited area of the workings potential buildings within the highest parts of the development area could be determinable and seen within a narrow view that is available towards Clayton West (see Image 5.10 above).

The Theoretical ZTVs shown at Figures 5.9 and 5.10 illustrate potential visibility from two areas of the site. These illustrate the benefit afforded by the moderate height of the vegetation that flanks the water course which flows from this location towards Wakefield Road. This hedgerow has been assessed to be an average of 4m in height, although trees and gaps provide variation along the extent of the hedgerow.

There is not presently public access to the iron workings site. Were this to change in the future it would be unlikely that development within the CWDCL land would be discernible to the casual observer. Views from the designation area extend principally to the east and south and the CWDCL land appears removed from the urban influences which exist within Clayton West and Scissett along the Dearne Valley to the west.

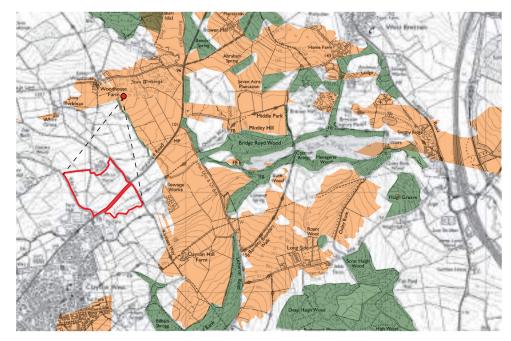


Figure 5.8 Zone of theoretical visibility of 9m buildings from location I



Image 5.11 View south from Location 02

5.4 Summary of Potential Impact upon Heritage Assets

5.4.1 Bretton Hall

The viewpoint locations included within the Bretton Hall registered park are considered to be a good representation of the few locations from within the designation from where the site may be visible.

As demonstrated, the extent of woodland within the designated landscape provides significant screening from most viewpoints. Where views may be afforded, these are from peripheral areas, mainly those to the west, and from which views are channelled between areas of existing woodland. From other views, these areas of woodland prohibit views of the CWDCL land.

Potential impacts are considered to be limited to occasional, narrow views that are afforded from short sections of Public Rights of Way which are located within the designation. Where development within the site may be discernible, the CWDCL land is at such a distance from receptors, that the development would comprise a minor addition within the distant landscape and is not considered detrimental to the existing landscape quality or features which form a setting to the designation.

Overall, the anticipated impact of the CWDCL land would be **negligible** in that there would be no obvious change to the existing landscape quality, the character or setting of the designation would remain intact and visibility towards the land from areas within the designation is limited. Where mitigation is proposed in relation to local landscape and visual effects of development (refer to section 6.0), it is considered that this would also benefit the few instances where visibility does occur.

Consideration has been made for the potential for landscape mitigation to be located beyond the site and which may strengthen the existing screening benefits afforded by existing landscape elements. In the two locations closest to the site (1 and 2) where potential visibility exists, new tree planting would only be beneficial when it is located either in close proximity to the site (within the site) or in proximity to the receptor (at or near the viewpoint location). New planting within the intermediary landscape would be unlikely to provide sufficient benefit over and above tree planting which could occur within the site.

Technical interrogation of the potential benefits which could be afforded through the inclusion of new structure tree planting within the site demonstrate that reduced visibility of new buildings could be achieved within a relatively short time period.

The inclusion of new belts of landscape, including tree planting within the site would comprise a positive response to the local landscape context. Where views are identified from within Bretton Park, the perception of new buildings would be reduced through greater assimilation into the receiving landscape. Such treatments would be more readily provided within larger CWDCL site than the current proposed allocation site which is more constrained, both by area and the

influence of topography. For this reason, we see no obvious benefits in allocating the site presently put forward by Kirklees MDC as opposed to the CWDCL site in relation to the percievable changes from this heritage asset.

5.4.2 Medieval Ironstone Pits of Bentley Grange

With respect to the Scheduled Monument of the Medieval Ironstone Pits of Bentley Grange, despite the proximity of the CWDCL land, it is unlikely that development within the land would be visible due to the local topography and the bell pit features within the designation and vegetation between the Site and the designation which acts to screen views towards the land.

The anticipated impact upon this designation, it's character and setting is considered to be that of negligible.





Green Belt and Landscape Recommendations

6.0 Green Belt

6.1 Introduction

One of the twelve core planning principles set out within the NPPF is that planning should: "take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it" [6]

The difficulties faced in areas where Green Belt comprises a high proportion of land is to determine locations appropriate to accommodate new growth to sustain local communities in the future. The land at Wakefield Road (draft allocation site E2333) is the only site within the Kirklees South East Policies Map area allocated for employment use within this part of the Kirklees District (Appendix A). The site lies within land which is presently located within the Green Belt and has been deemed appropriate for release by the Council. This section examines the appropriateness of the Council's suggested allocation site boundaries and makes recommendations where appropriate.

6.2 Protecting Green Belt Land

'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'. Para 79 [6]

The NPPF states that Green Belt serves five purposes:

- 'To check 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.' Para 80 [6]

Development occurring within the Green Belt must utilise, or create a strong new boundary which must be robust and defensible against future development demands in order to achieve the objectives of the Green Belt, as set out at within the NPPF. Paragraph 85 outlines six factors local authorities should consider when defining Green Belt boundaries. These are as follows:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period:
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the
 permanent development of safeguarded land should only be granted following a Local Plan review which proposes the
 development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent' Para 85 [6].

6.3 KMBC Site Allocation

As part of the development of the Draft Local Plan, Kirklees Council has prepared a Green Belt Review and Outcomes Report [5] which includes "a review of the green belt edge and the land immediately beyond it to determine the degree of constraint to development and the degree to which land performs a green belt role" section 1.3.3 [5].

Figure 6.1 reproduces the assessment prepared by Kirklees in relation to the Green Belt edge in proximity to the site, as contained at Kirklees Rural (East) Plan within the Green Belt Review and Outcomes document [5].

In adopting the methodology of the Kirklees Draft Local Plan Green Belt Review and Outcomes Report [5], and in undertaking field work, Figure 6.2 and Table 6.1 illustrates the potential change to the Green Belt which may arise from the allocation of site E2333 (that which had been originally put forward in November 2015) and assesses the ability of the allocation site to accord with the considerations as set out at Paragraph 85 of the NPPF.

Our appraisal of site E2333 found that the northern boundary did not relate to any feature on the ground that could create a strong new defensible boundary and which would leave adjacent land vulnerable to future encroachment. The boundary placed an arbitrary line across several fields which did not relate to field boundaries, or other existing landscape features.

Having undertaken a review of Site E2333 in relation to the wider landscape condition, we consider that a more appropriate Green Belt edge would be provided by utilising the existing drive which leads to Gillcar Farm and the definition provided by the farm buildings and field boundaries. These elements collectively extend from Kiln Lane in the west to the beck that flows to the west of the route of the Kirklees Way. To the north of Gillcar Farm, an existing overhead line runs broadly east - west across the farmland and we consider that this constraint to development will provide further definition of the Green Belt edge, beyond which any potential for future development would be segregated from the settlement and perceived to impact upon the openness of the Green Belt.

The boundary of the CWDCL land utilises the existing lane defined with well established, mature native hedgerows and existing farm buildings at it's northern boundary. We consider this to provide a more appropriate new Green Belt boundary. Figure 6.3 illustrates our appraisal of the CWDCL land in relation to the methodology of Kirklees' Draft Local Plan Green Belt Review and Outcomes Report [5] (Appendix D).

In utilising the CWDCL site, more meaningful space would be provided within which to incorporate new landscape

	Test 1: Constraints			Test 2: Green Belt Purp	ooses			1	
	Test 1a	Test 1b	Test 1c	Existing use	Test 2a	Test 2b	Test 2c	Test 2d	Test 2 Score
	Topography	Physical	Environmental		Prevention of merger	Checks	Safeguarding	Historical	
					of settlements	sprawl	encroachment	setting	
Allocation site northem boundary	Moderate	None/minor	None/minor	Grazing land/cultivated land	Extensive gap	No containment provided. New boundary edge would be required along lenth.	Relates to countryside to the north with no features or definition along boundary. Development pressure would be likely to the north.	No impact	5: Important role
CWDCL land northem boundary (east of Gillcar Farm)	None/minor	Moderate	Moderate	Grazing land/cultivated land beyond tarmac drive to Gillcar Farm and farm buildings.	Extensive gap	Some containment by constraint of overhead lines. No other existing definition.	Some relationship with wider countryside, but constraint provided by overhead lines.	No impact	3: Moderately important role
CWDCL land northem boundary	None/minor	Significant	Moderate	Grazing land/cultivated land beyond tarmac drive to Gillcar Farm and farm buildings.	No further test is given if a significant constraint is identified.				Shown black on Figure 6.3

Table 6.1 Summary of Green Belt Outcomes based upon the tests set out within the Kirklees Draft Green Belt Review Outcomes Report [5]



elements which could reinforce existing features and landscape pattern which contribute to the local character.

The Council's original proposed allocation site E2333, and revised site E2333a, do not respond to the requirements of the NPPF with respect to the definition of new Green Belt boundaries that 'use physical features that are readily recognisable and likely to be permanent' Para 85 [6] whereas the CWDCL land is more robust in provision of this. We consider that the proposed allocation site would provide fewer opportunities than the CWDCL land to incorporate such measures and enhancements as identified above due to the higher density of development which would be necessary to achieve the desired employment floor area within the site.

In responding to a report prepared by the KMBC Landscape Officer, we provide further consideration of the Green Belt edge in relation to the revised KMBC site E2333a at Section 7.4 of this document.

6.4 Landscape Recommendations

By it's very nature, the release of land from the Green Belt tends to result in negative connotations and in undertaking our appraisal, we identify factors which we recommend are incorporated into the development masterplan to assimilate the changes occurring within either the Council's allocation site or the CWDCL land into the wider landscape. Figure 6.4 provides a strategic approach to the potential development of the CWDCL land. This aims to:

- Incorporate measures which will integrate development into the wider landscape by reflecting the local landscape character and pattern;
- · Strengthen the boundaries along the redefined Green Belt edge;
- · Provide opportunity for ecological enhancement and sustainable drainage within the site;
- Mitigate where the development could be visible from locations in the surrounding area.

We also make the following recommendations with respect to the future development:

- Where existing vegetation within is removed to facilitate development, the integration of new tree planting and landscape treatments should be strategically located to provide softening and integration of new buildings within the view. These should be able to incorporate large scale tree species such as oak, beech, hornbeam, sycamore, lime, and alder.
- The scale and massing of buildings north of Wakefield Road should be carefully considered to be reflective of local
 character and pattern. It is recommended that buildings within the northern part of the site don't appear to exceed
 the height of existing farm buildings at Gillcar Farm. Larger buildings should be situated within lower areas and reduce
 in height and footprint with elevation on the valley side.
- Building appearance, materials, finishes and colours should be sensitive to their location on the urban/rural edge and be designed to recede into the landscape.
- The retention of existing tree and hedgerow vegetation to the site boundaries would provide intervention in views of
 development from some locations and supplementing this boundary vegetation with new planting, particularly to the
 east and along Wakefield Road is recommended to improve screening and would bolster the redefined edge of the
 settlement.
- Along the River Dearne on the southern boundary, existing trees and wetland habitat could be managed and enhanced for greater wildlife value and to potentially provide improved access to green space.



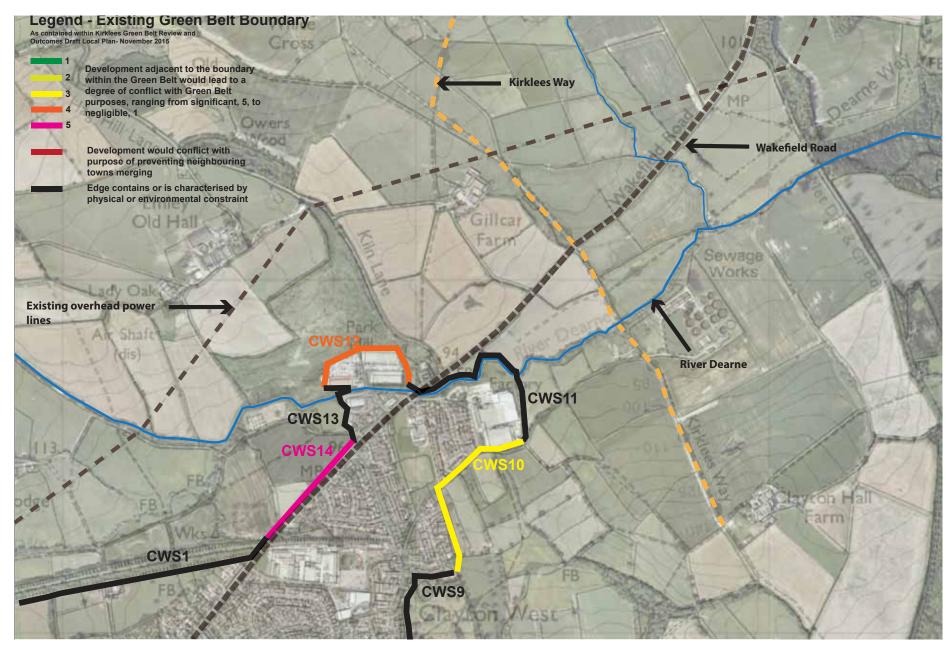


Figure 6.1 Existing Green Belt as contained within Kirklees Green Belt Review and Outcomes Draft Local Plan



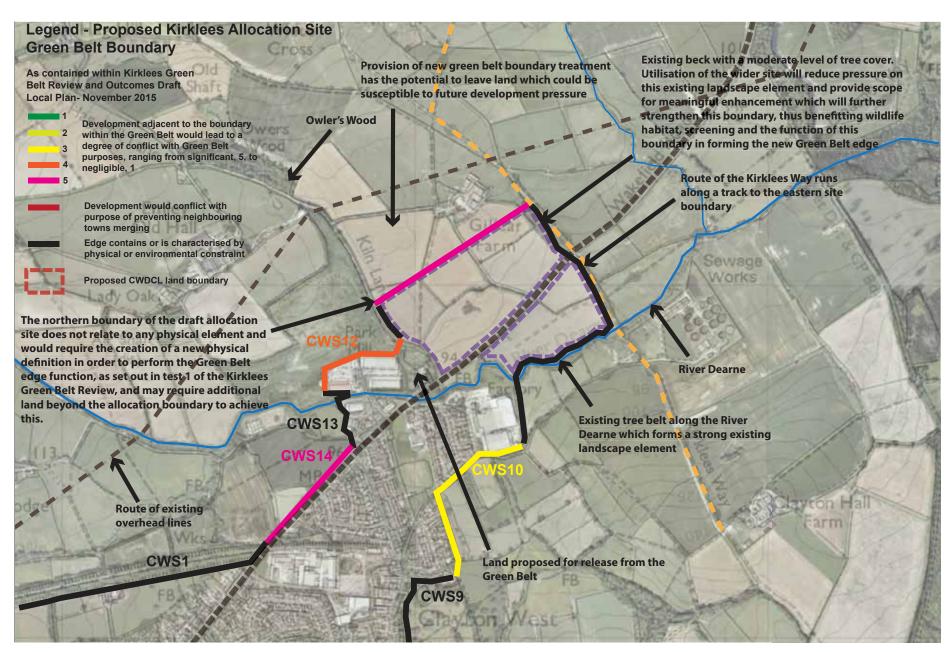


Figure 6.2 Green Belt boundary including original proposed Allocation site E2333

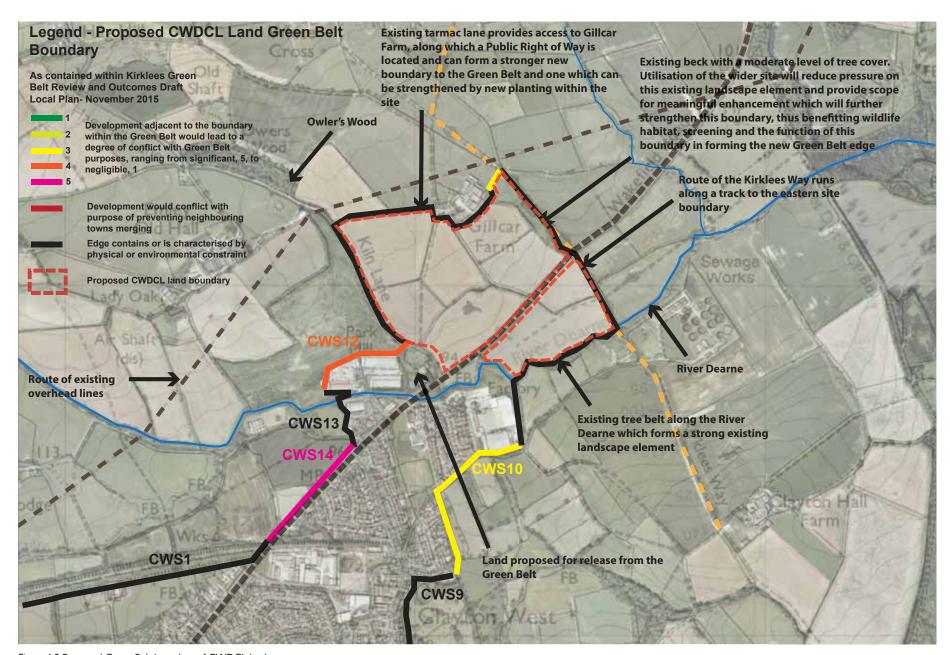


Figure 6.3 Proposed Green Belt boundary of CWDCL land





Figure 6.4 Proposed Green Belt boundary including wider site utilising existing edge constraints





7.1 Introduction

In undertaking consultation on the Draft Allocations for inclusion within the emerging Local Plan, Kirklees Metropolitan Borough Council has provided Clayton West Development Company Limited (CWDCL) with the report prepared by their Landscape Officer.

The inclusion of the KMBC site (E2333) as future employment land within the Draft Local Plan indicates that landscape and visual impacts arising from the development of this site are considered acceptable, however further to representations made by CWDCL, KMBC accept the boundary of the site would not have been in accord with requirements for a new defensible Green Belt edge. KMBC have since adjusted the northern boundary of the site following advice from their Landscape Officer and this is now reflected in the publication draft Local Plan as site E2333a. Further work undertaken during July 2016, considers theadjusted site now proposed within the draft Local Plan to be a baseline, upon which the additional land contained within the CWDCL site is further appraised.

This section provides additional evidence to support the findings of earlier appraisal set out within sections 2 to 6, that the utilisation of the wider site, as proposed by the CWDCL, can be developed with acceptable changes to landscape and visual amenity and to demonstrate that it's allocation offers a more viable, robust and sustainable solution when considering Green Belt purposes alongside the provision with the Local Plan for sites that can deliver future employment use.

7.1.1 Application of methodology

As set out within the previously undertaken landscape study, this document does not comprise a formal Landscape and Visual Impact Appraisal (LVIA) and site survey and base line work has been undertaken with a view that further assessment would be undertaken in relation to future planning applications.

For each of the following instances where the Landscape Officer raises concerns, we provide a summary conclusion within which we outline the anticipated magnitude of change which could result when considering the impact of the additional land included within the CWDCL site, considering the KMBC allocation site as a baseline.

7.1.2 Site viability and design

In order to develop the land, both that within site E2333a and the CWDCL site, constraints posed by the sloping nature of the land located north of Wakefield Road require engineering solutions to achieve deliverable developable space. In preparing information in support of the CWDCL site, a strategic masterplan has been developed. This has taken into consideration advice to mitigate for landscape and visual effects, integrate development into the surrounding landscape and reinforce a strong, new Green Belt boundary.

In reviewing the concerns raised by the Landscape Officer, further detail has been considered in relation to the form and configuration of development of the CWDCL site. In conjunction with this, we have prepared the following information which supports the CWDCL site as more appropriate for allocation. This has enabled the design team to test design parameters for the site within which it is considered that development will have nominal or no residual landscape or visual impacts beyond those which are considered acceptable for the site E2333a. These are summarised as follows:

- The drawing at Figure 7.1 has been prepared to provide strategic landscape areas within the site and to site boundaries. These vary between 20m along Kiln Lane and 30m between each development plateaus and a minimum of 30m adjacent to Gillcar Farm and the farm lane where a wider landscape belt can be incorporated to form the redefined Green Belt edge.
- We identify indicative plateau levels and building heights which respond to the existing topography and the relationship with Gillcar Farm.



The Landscape Officer raised concerns which related to the increased visibility of development which would occur within the northern part of the site and stated that "future development for employment would be more in keeping therefore, if it is contained within the lower valley areas and adjacent to the river rather than extending to the upper valley sides and intruding further into the green belt."

The settlements of Clayton West, Scissett and settlements to the west extend further up the valley sides than the proposed development site. Within Clayton West, urban areas extend up to approximately I50mAOD to the southern valley side. On the northern valley side, to the west of the site, development extends to I35m near Scissett, and which will be extended by future housing allocation (Ref H222 in the Draft Local Plan).

The difference in elevation between the most elevated location of site E2333a and that of the CWDCL site is 4.51 m. Figure 7.2 shows a series of cross sections which put the location of the respective sites into the wider valley context. We acknowledge that the CWDCL site is larger and incorporates land that is slightly more elevated than site E2333a. However, as illustrated within the cross sections, the extent to which the CWDCL proposal presents such a perception of further 'intrusion' into the Green Belt should be considered on balance to the anticipated increased impacts upon landscape, visual amenity and fundamentally, how each site responds to the Green Belt purposes along side the ability of the site to deliver sustainable, appropriate future development.

Three images provided within the Landscape Officers' report show the view from the Kirklees Way to the southern valley side and highlight i) the existing view ii) the original allocation as proposed in the Draft Local Plan (E2333) and; iii) the proposed CWDCL development area. We consider that three images show the minimal additional site area which is visible from that location on the Kirklees Way. To further demonstrate this, we include lines of sight for receptors at viewpoint 2 and viewpoint 14 (as located on Figure 7.4), from the south and the north of the site respectively. These illustrate the way the sites could be developed to respond to the topographical constraints and incorporate landscape elements which will accord with wider landscape character and provide opportunities for integration of the development into the receiving landscape when seen from the surrounding area.

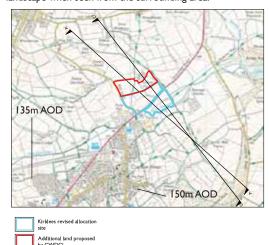
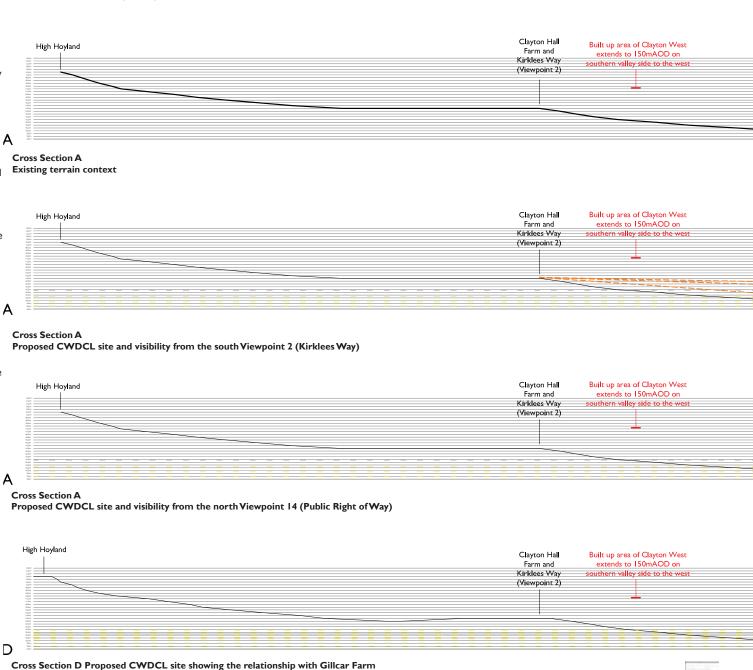
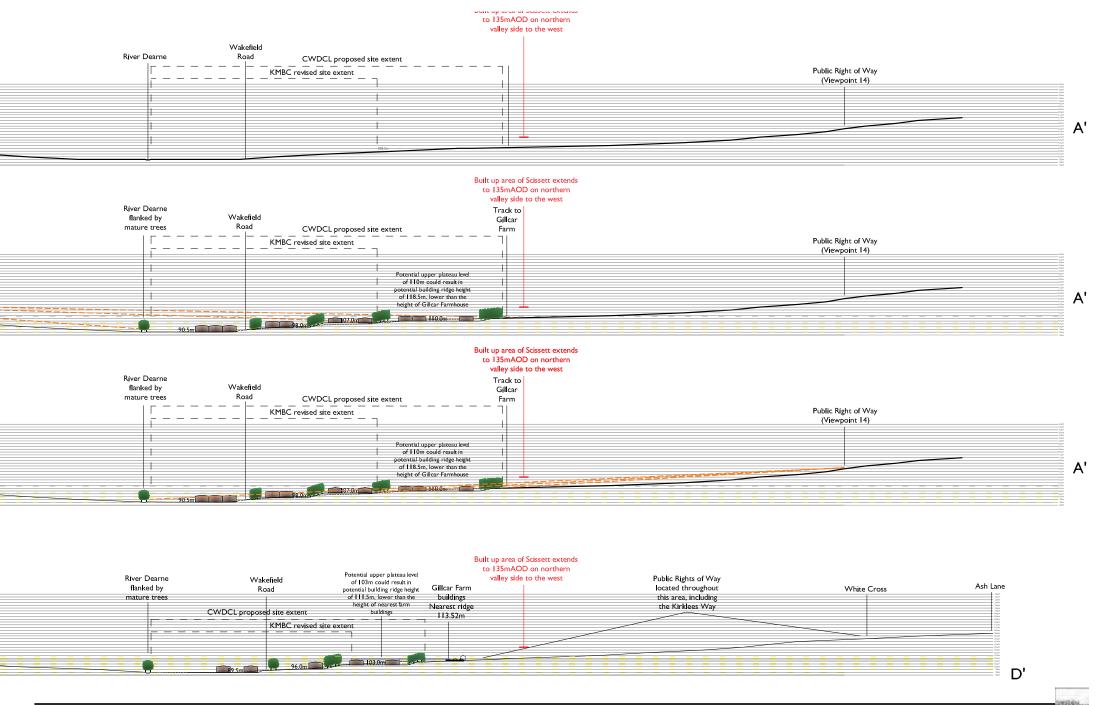


Figure 7.3 Cross section locations

Figure 7.2 Cross sections through the site and wider Dearne Valley Scale 1:5000 at A1 (width)





7.2 Impacts on Visual Amenity

The perception of the increased site area, as proposed by the CWDCL site may be less in reality than when viewed in plan due to physical elements within the landscape which assist screening and the nature and extent of visibility afforded towards the site from the surrounding areas. The visual appraisal (Section 4) provides a series of representative views from a variety of receptors located within the study area and concluded that for the CWDCL site:

- There is good screening from the west and development would not be seen as out of context in consideration
 of the existing urban land uses along Wakefield Road within Clayton West and Scissett.
- Within the principal residential areas of Clayton West, visibility of the site is limited.
- Where rights of way pass in close proximity to the site there will be a definitive change to the views however it
 would be seen as reflective of the context of the nearby large scale factory and the wider settlement of Clayton
 West.
- From receptors further south more open views across the valley are afforded, within which the part of the site
 which lies to the north of Wakefield Road is visible as it rises up the valley side, and which would be visible were
 either site developed. In allocating this part of the site it is anticipated that KMBC accept the visibility of this
 part of the CWDCL site.
- Residential receptors with visibility of the site are few and comprise farm houses at Clayton Hall Farm, residential
 property on Litherop Road (Viewpoint 3), White Cross and Yew Tree Farm to the north and Gillcar Farm
 adjacent to the site and there is potential for the development of the site to result in a notable change within
 their views.

In response to the concerns raised about the visibility of northern part of the site put forward by the CWDCL, we have reviewed the potential change to views at previously visited locations (excepting locations where we anticipate no change to views from the development of either site extent) and consider the change which could result from the development of site E2333a in relation to that anticipated for the proposed CWDCL site. In considering the potential change, we have prepared a series of images upon which we illustrate the existing view and visibility of the KMBC site E2333a and CWDCL sites respectively.

The series of images illustrate that:

- Based upon visibility of the bare ground (as shown within the photographs), there are very few locations
 where receptors would determine a discernible change in the extent of development that would be visible
 were the CWDCL to be developed.
- The nominal change is further demonstrated by referring to the cross sections at Figure 7.1, which provide an indicative proposal for how the CWDCL site could be developed to accommodate the sloping topography of the land to the north of Wakefield Road. Plateaus within the site provide an opportunity for the incorporation of banks of landscape which further negate visibility of the northern most part of the CWDCL site.
- The panorama at Figure 7.5 was taken from the Public Right of Way within the current KMBC site allocation, marked on Figure 7.4 with a star. This demonstrates the nominal difference in elevation between the KMBC and CWDCL sites whereby the most elevated part of the CWDCL site is obscured by the intervening hedgerow.

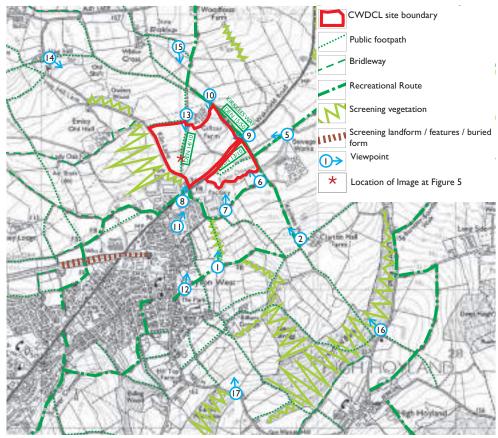


Figure 7.4 Viewpoint location plan with proposed CWDCL site extent outlined in red

Summary of change

Based upon the indicative parameters explored within this appraisal, the anticipated magnitude of change to visual amenity which could arise from the development of the northern part of the CWDCL site when considering the KMBC allocation site E2333a as a baseline, is considered to be **low to negligible**. When considering the increased potential to incorporate appropriate landscape belts within the CWDCL site, the residual impact could be anticipated as being **minor beneficial** in relation to KMBC proposed site E2333a.



Figure 7.5 View north east from Public Right of Way within the most westerly field of the KMBC allocation site E2333a



Viewpoint Location 1 - View north from the Kirklees Way.



Proposed allocation site(s) within the wider context of views from this viewpoint location

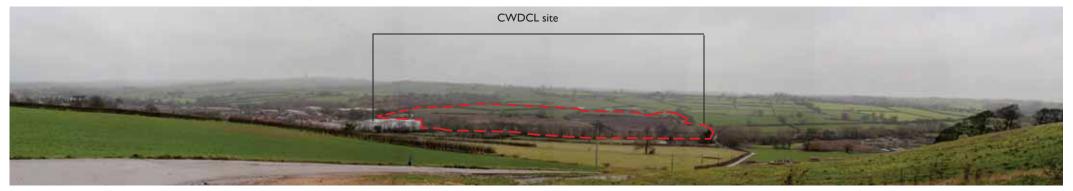


Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)

Viewpoint Location 2 - Kirklees Way and residence at Clayton Hall Farm



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 3 - Public Right of Way at Litherop Road



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 4 - Dearne Way east of the site



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site is not visible from this location



Viewpoint Location 5 - Dearne Way east of the site



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 8 - View from residential properties on Whinmoor Drive



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site is not visible from this location





Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site is not visible from this location due to the more level topography within areas of the most northern parts of the CWDCL site. Visibility of buildings within the northern part of the CWDCL site would be obscured behind development adjacent to Wakefield Road.

Viewpoint Location 11 - Clayton West cricket ground



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 12 - View towards the site from the Millennium Green



Existing view from within the Millenium Green



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 13 - Public Right of Way at Gillcar Farm at the northern boundary of the CWDCL land



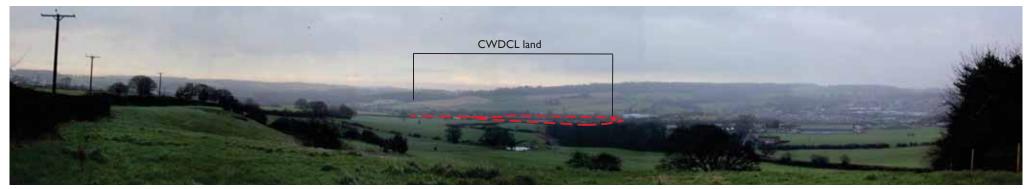
Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 14 - Public Right of Way at Hag Hill



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 15 - Public Right of Way near White Cross iron workings



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



Viewpoint Location 17 - Rear of residential property on Bank End Lane



Proposed allocation site(s) within the wider context of views from this viewpoint location



Visibility of KMBC site E2333a (shaded yellow)



Visibility of KMBC site E2333a (shaded yellow) and CWDCL proposed site (shaded pink)



7.2. I Visual Impact on Kiln Lane

The Landscape Officer raises concerns that visual impacts for receptors on Kiln Lane (which forms the western boundary to the sites) would be increased as a result of development of the larger site extent as proposed by the CWDCL.

In undertaking an additional site appraisal for potential visual impacts along Kiln Lane, we include a series of photographs from locations indicated on Figure 8.6. These show the existing context to this route and the existing limited visibility into the site from Kiln Lane.

To supplement the parameters shown within the Indicative Development Strategy Plan (Figure 7.1) cross sections have also been prepared which demonstrate the screening currently afforded by local topography and existing hedgerows in combination with indicative development plateau levels, building heights and new landscape treatment within the site (Figure 7.7).

We set out our findings as follows:

- Kiln Lane is afforded a high degree of enclosure for much of its route.
- · There are no pavements and the route is winding and narrow in places.
- The CWDCL site is located at a higher level than the road and is flanked by mature hedgerows (Image L).
- The provision of new woodland scale planting to reinforce the new Green Belt edge, as proposed by the CWDCL site, would reduce visibility of buildings within the site and reinforce the existing enclosed nature along parts of the route.
- Embankments to the northern parts of the CWDCL site would set development lower within these areas and
 combined with proposals for landscape boundary treatment would strengthen the existing landscape character
 and reduce visibility into the site.

Summary of change

Based upon the indicative parameters explored within this appraisal, the anticipated magnitude of change to receptors on Kiln Lane which could arise from the development of the northern part of the CWDCL site when considering the KMBC allocation site E2333a as a baseline, is considered to be **negligible**. When considering the increased potential to incorporate appropriate landscape belts within the CWDCL site, the residual impact could be anticipated as being **neutral** in relation to the proposed KMBC site E2333a.

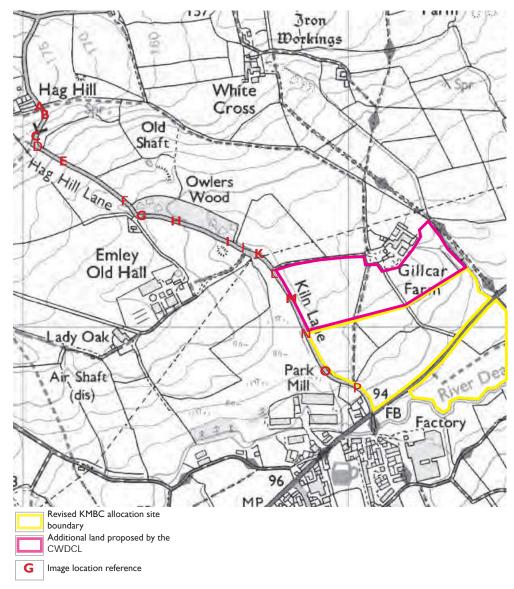


Figure 7.6 Image locations along Kiln Lane





































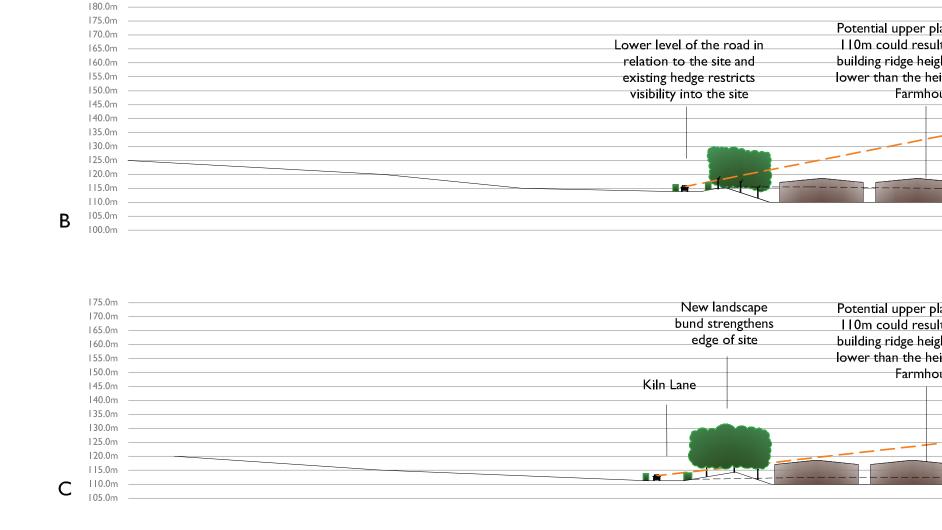
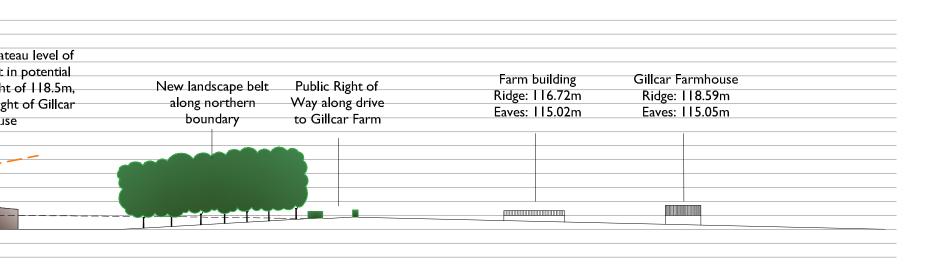


Figure 7.7 Cross sections showing the relationship between the CWDCL site and Kiln Lane Scale I:1000 at AI (width)

185.0m





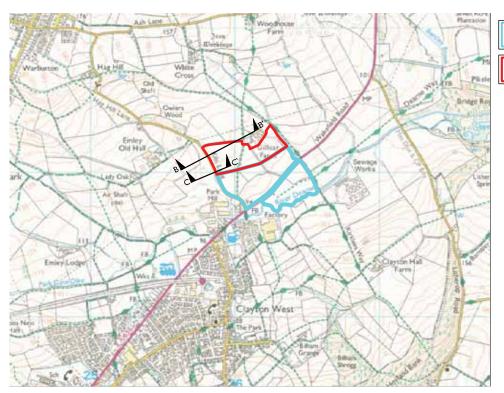


Figure 7.8 Cross section locations

Kirklees revised allocation

Additional land proposed

by CWDCL

7.3 Impacts upon Public Rights of Way

The Landscape Officer identifies that 'restricting the development to the original alignment for employment (and keeping it largely to the south of the existing PROW DEN 14/10) would reduce the extent of change and impact to the users of the footpaths.'

We have reviewed the experience of users on these rights of way in relation, not only to their direct experience, but to consider the changes that could result for either the Kirklees site E2333a, and the larger proposed CWDCL site. The series of images below provides existing landscape context users of these Rights of Way experience upon their approach to the site(s) from the north. Having undertaken additional site appraisals of these Right of Way, we make the following observations:

- The additional length of footpath which would be directly affected by the development of the CWDCL site is 180m (between location A and Z on Figure 7.9).
- We consider that the truncation of the right of way DEN14/10 at the point where it connects with Gillcar Farm lane, also a PROW, would be a logical point at which walkers transition between the rural landscape to the north and development within the CWDCL site.
- By incorporating development within the wider site, a more gradual transition would be afforded to these users, as
 their approach from the north already incorporates clear visibility of the existing farm buildings. The inclusion of
 landscape to supplement the existing hedges along the track to Gillcar Farm would reflect wooded character of the
 wider area. Such a treatment would not be achievable within the constrained site extent of the revised KMBC site
 and may result in development within the site being more apparent as PROW users approach from the north.

There are key links between the impacts on users of these Rights of Way and the definition of the Green Belt edge (refer to section 4.0). Development of either site would require implementation of elements or features which act as a strong, defensible Green Belt edge.

- We consider that greater scope lies within and beyond the CWDCL site to more strongly define the Green Belt in
 this location and that users of a 180m stretch of footpath will not be impacted on to such an extent that the wider
 journey and experience of the landscape elswhere along the route is affected to the extent that development of the
 CWDCL site should be precluded.
- There is greater opportunity within the larger, CWDCL site, for the incorporation of landscape mitigation and appropriate route for the incorporation of the Right of Way within the site.
- Development of the CWDCL site we consider, would have very limited residual impact over and above that
 associated with the revised KMBC allocation site E2333a.

Summary of change

Based upon the indicative parameters explored within this appraisal, the anticipated magnitude of change to users of Public Rights of Way which could arise from the development of the northern part of the CWDCL site when considering the KMBC allocation site E2333a as a baseline, is considered to be **low to negligible**. When considering the increased potential to incorporate appropriate landscape belts within the CWDCL site, the residual impact could be anticipated as being **minor beneficial** in relation to the KMBC site. E2333a

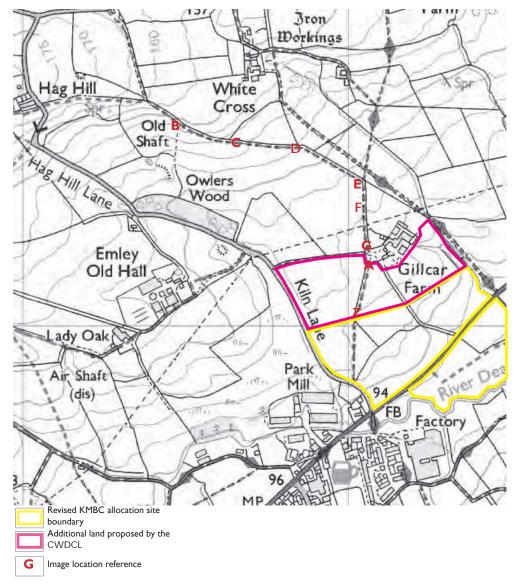


Figure 7.9 Image locations along Public Rights of Way to the north of the sites.



Viewpoint Location A



Existing view from the stile adjacent to Gillcar Farm buildings



Potential change to view from new landscape belt to define new Green Belt edge of revised KMBC allocation site E2333a

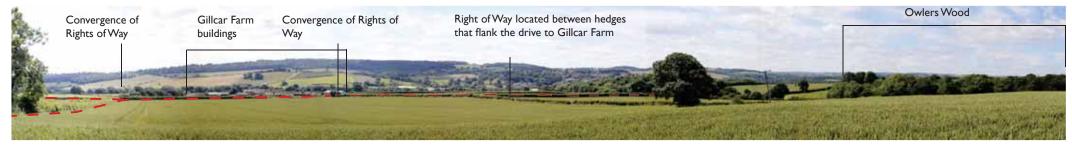
Viewpoint Location B



Viewpoint Location C



Viewpoint Location D



Viewpoint Location E





Viewpoint Location F



Viewpoint Location G





Edge of CWDCL site

Right of Way located between hedges that flank the drive to Gillcar Farm



7.4 Green Belt

Further to our appraisal work previously undertaken (section 6) with respect to the Green Belt, we note that in the Landscape Officer's report there is no consideration of the respective site's capacity to 'define boundaries clearly, using physical features that are readily recognisable and likely to be permanent (Para 85 of the NPPF) and no commentary upon the proposal for the CWDCL site to achieve this.

We have undertaken additional site work to interrogate the revised allocation site E2333a now proposed by KMBC and annotated photographs included in the following pages illustrate the existing condition of the northern boundaries of the KMBC site E2333a and CWDCL sites.

KMBC Proposed allocation site E2333a (boundaries A, B and C on Figure 10)

- 175m (30%) of the proposed northern boundary has no existing feature on the ground (boundary A).
- Boundary B comprises a predominantly hawthorn hedge 2.5m x 1.5m wide, in good condition with few gaps with no hedgerow trees.
- Boundary C comprises a hedge 2.5m 4m in height x 1.5m wide. Predominantly hawthorn, with some rose and elder.
 Gaps in places. 3No existing trees: Oak has 700mm diameter trunk. Two ash, one in decline. One with 500mm diameter trunk.
- In considering the constraints posed by the trees along this boundary, we recommend an offset of 8.5m minimum
 south of these trees before any level changes occur within the site. This would therefore impact upon the developable
 area that could be achieved by the KMBC site E2333a, notwithstanding the supplementary landscape we believe would
 be necessary to reinforce this insubstantial boundary when balanced with those of the CWDCL site.

CWDCL Proposed allocation site (boundaries D, E and F on Figure 10)

- Boundary D is located to the south of the driveway leading to Gillcar Farm from Kiln Lane. The drive is single vehicle
 width and surfaced in tarmac and is located between mature hawthorn hedgerows that extend the length of the drive,
 with the exception of occasional gateways. Telegraph poles are located periodically along the southern (site) side of
 the drive, and to the northern side, both located along the drive and within the adjacent field to the north, overhead
 power lines.
- Boundary E runs to the south of the group of buildings of Gillcar Farm. The farm buildings comprise a mix of stone built outbuildings and small barns, and a series of larger, more modern farm buildings/barns.
- The Public Right of Way which follows the farm drive converges with the Right of Way that connects White Cross and Clayton West, via the site(s). The point at which the footpaths connect is where boundary D and E meet, the approach to which becomes increasingly characterised by the visibility of the farm buildings and some awareness of the surrounding electrical infrastructure. A sense of arrival at this convergence point would provide a more coherent opportunity for the incorporation of the transition between the wider Green Belt and the new settlement edge.
- Boundary F, to the east of Gillcar Farm, extends approximately 50m (8% of the northern boundary) between the farm buildings and the eastern site boundary. This section of boundary is presently undefined, however it's limited extent and location adjacent to other physical elements (overhead lines and watercourse) which would act to constrain development to the north or east, significantly limit the propensity for development beyond this boundary.
- In addition to the strong existing elements along the northern boundary, the indicative development strategy
 proposes the enhancement of these boundaries by creating new landscape belts that response to local character and
 which will also reduce impacts upon visual amenity.

Summary

We consider that the CWDCL site offers the most robust solution to redefinition of the Green Belt. The site accommodates not only future developable land, but also existing features which can be strengthened within or beyond the site (if necessary) and that offers greater scope to more effectively mitigate against visual and landscape character effects, while presenting a nominal additional intrusion or harm to the landscape, rather than the 'significant intrusion and harm' stated in the Landscape Officer's report.

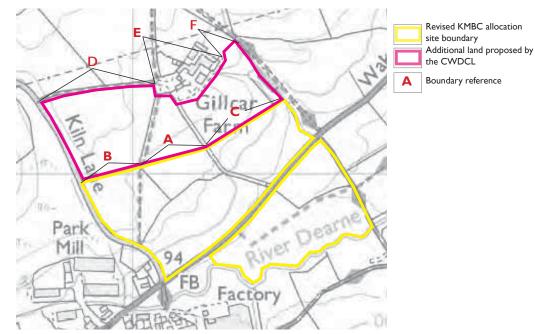


Figure 7.10 Northern site boundary reference plan

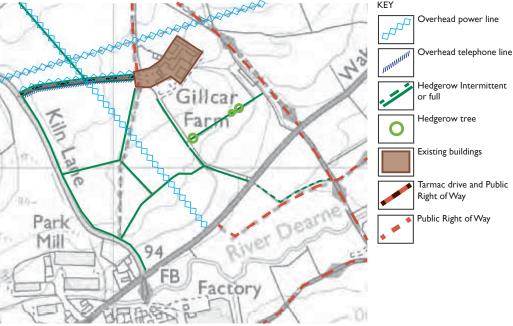


Figure 7.11 Site boundary types and features



Boundary A



Existing view from the stile adjacent to Gillcar Farm buildings

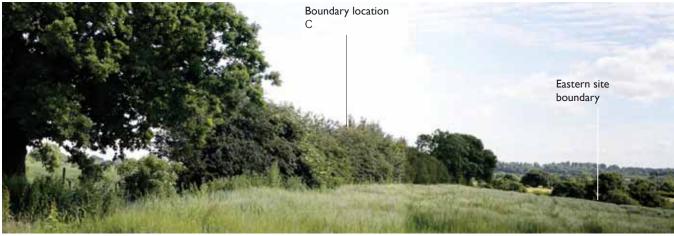


Boundary B



2.5m x 1.5m wide. Predominantly hawthorn, with very occasional elder.

Boundary C



Approximate line of KMBC revised allocation site E2333a boundary location A. Currently not defined on

2.5m - 4m in height x 1.5m wide. Predominantly hawthorn, with some rose and elder. Gaps in places. 3No existing trees: Oak has 700mm diameter trunk. Two ash, one in decline. One with 500mm diameter trunk.

We recommend an offset of 8.5m minimum south of these trees before any level changes occur within the site.









Existing telephone line and overhead power lines run adjacent to the driveway

Boundary E



Public Right of Way





Summary

8.0 Summary

8.1 Landscape Character

While it is acknowledged that the agricultural land of the site contributes to a wider landscape character that is positive in nature, it's juxtaposition to the existing eastern edge of Clayton West, in particular large scale buildings within the valley floor, provides an urban landscape context within which the development of the CWDCL land would appear as a logical urban extension along Wakefield Road. This would continue the linear form of the existing settlements along the lower valley reaches and partially up the northern valley side. The tree and hedgerow-lined route of the Kirklees Way would edge the redefined easterly extent of Clayton West.

The CWDCL land provides scope to accommodate the recommendations made within this document, which would provide mitigation and increase potential to assimilate development within the local landscape pattern and character.

8.2 Other Statutory and Non Statutory Landscape Designations and Classifications

With the exception of direct impacts upon two Public Rights of Way that exist within the site, there are no anticipated direct impacts upon other designations within the study area. Potential indirect effects upon the heritage assets of Bretton Park and the Bentley ironworks are summarised at 7.4.

The Council's suggested allocation site may afford reduced opportunity to accommodate a diversion route of the Rights of Way located within the northern part of the site. The density of development which may be required within the site area may also offer limited opportunity for new green infrastructure within the site, along which a diverted route could be located.

Through utilisation of a larger site area put forward by the CWDCL, there is considered to be increased scope to enhance, or retain the right of way within the northern part of the site, or include within the site an appropriate new route which could benefit from new landscape which could in addition reflect local landscape character, pattern and greater integration of development.

8.3 Visual Amenity

Due to the screening effects of the existing topography, vegetation, and built form within Clayton West, the CWDCL land is afforded good screening from the west and it's development may not be seen as out of context in consideration of the existing urban land use along Wakefield Road within Clayton West and Scissett.

Within the principal residential areas of Clayton West, visibility of the site is limited. Here views are obscured and filtered by intervening buildings. Where the CWDCL land is visible, new buildings may not be seen as out of context with other visible nearby land uses of the factory to the south of Wakefield Road and the industrial/commercial area at Colliers Way.

Key receptors that are likely to experience a change are users of the Public Rights of Way to the north, east and south of the site. These include those using the Kirklees Way and Dearne Way recreational routes. Where rights of way pass in close proximity to the site there will be a definitive change to the views however it could be seen as appropriate in the context of the nearby large scale factory and the wider settlement of Clayton West.

More distant receptors tend to be located on the more elevated valley sides, where views across and along the valley are quite extensive. Generally the part of the site which is located to the south of Wakefield Road, adjacent to the river, is obscured from the south and east by trees and from the north by intervening land. Development occurring within this southern part of the site may not be considered to be out of character with the other surrounding land uses, given the presence of the existing factory to the west of the site and the nature and character of development existing along Wakefield Road.

From receptors further south more open views across the valley are afforded, within which the part of the site which lies to the north of Wakefield Road is visible as it rises up the valley side. Development within this part of the site would therefore be visible from these areas.

Residential receptors with visibility of the site are few and comprise farm houses at Clayton Hall Farm, residential property on Litherop Road (Viewpoint 3), White Cross and Yew Tree Farm to the north and Gillcar Farm adjacent to the site and there is potential for the development of the site to result in a notable change within their views.

8.4 Heritage Assets

The Grade II parkland landscape of Bretton Hall is well contained by belts of deciduous and coniferous woodland and undulating land form and also includes isolated mature parkland trees. Site assessment work in conjunction with computer generated theoretical visibility tests demonstrate that visibility of the CWDCL land from the Park is limited to more elevated, western areas of the designated landscape. Where such visibility exists, the site would be seen at some distance and through gaps within existing woodland.

In consideration of the contained nature of many areas within Bretton Hall, we do not consider that the visibility of the CWDCL land would impact upon the setting of the designation.

There would be no direct impact upon the scheduled monument of Bentley Grange ironstone pits located to the north east of the site and subtleties in the local topography, along with existing vegetation occurring along nearby water courses and field boundaries, prohibit views from much of the designated area. We do not consider that there would be any impact upon the setting of this designation of such magnitude that it should preclude the development of the site.

8.5 Green Belt

The Council's proposed allocation does not utilise any existing landscape elements or features along it's northern boundary and would not comprise a defensible new boundary to the Green Belt when considered against the relevant policy tests.

The lane leading to Gillcar Farm and the farm buildings provide elements which we consider provide a more appropriate, natural edge to the northern site extent. In creating a wider site area, as promoted by the CWDCL and reducing pressure for greater density of development there is greater potential for the utilisation of existing boundary features. The CWDCL land also provides space within it whereby these boundary features may be strengthened and enhanced, thus resulting in a more robust, defensible Green Belt edge.

8.6 Landscape Recommendations

In extending the site area to utilise existing landscape elements along the northern edge, additional opportunities are created for the inclusion of green infrastructure within the site.

By having regard to our recommendations for future site masterplanning, we consider that the CWDCL land appropriate for allocation.

8.7 Response to Landscape Officer's Report

As set out within appraisal work undertaken in response to the Landscape Officers' report, we provide additional detail which illustrates the way in which:



- I. The CWDCL site reflects the topographical and adjacent settlement context, the most northern part of which is little higher in elevation than land contained within the revised KMBC site E2333a and therefore wouldn't be perceived as extending further up the valley side.
- 2. Development of the most northern parts of the CWDCL site would have nominal impact upon wider visual amenity.
- 3. Development of the most northern parts of the CWDCL site would have an impact upon a short stretch of an existing Right of Way and provides a stronger, well defined settlement edge to approaches from the north.
- 4. Inclusion of the most northern parts of the CWDCL site enable the incorporation of appropriate landscape treatment within which the PROW within the site can be re-routed to provide a safe, accessible route into Clayton West.
- 5. Development of the most northern parts of the CWDCL site would have nominal impact upon visual amenity from Kiln Lane.
- 6. The removal of the CWDCL site from the Green Belt provides a more robust new Green Belt edge than the revised KMBC site whereby existing above ground elements within the landscape, in combination with the extent of new landscape treatment that can be accommodated within the site presents a more strongly defensible settlement limit.

It is hoped that the information contained within this document provides some indicative parameters which can guide planning applications. We find that the proposed CWDCL site offers stronger and defensible boundaries to the Green Belt and provides greater scope for the provision of green infrastructure that could appear more appropriate to local character and landscape pattern and offer greater visual and environmental benefits. Conversley, the Council's proposed allocation site E2333a would not be fully effective in defining a new Green Belt edge, and would afford limited space within the site to incorporate appropriate landscape to mitigate identified landscape and visual impacts.

By having regard to our recommendations for future site masterplanning, for the reasons set out above and as demonstrated throughout this appraisal process, we consider that the CWDCL site presents an appropriate site for development.



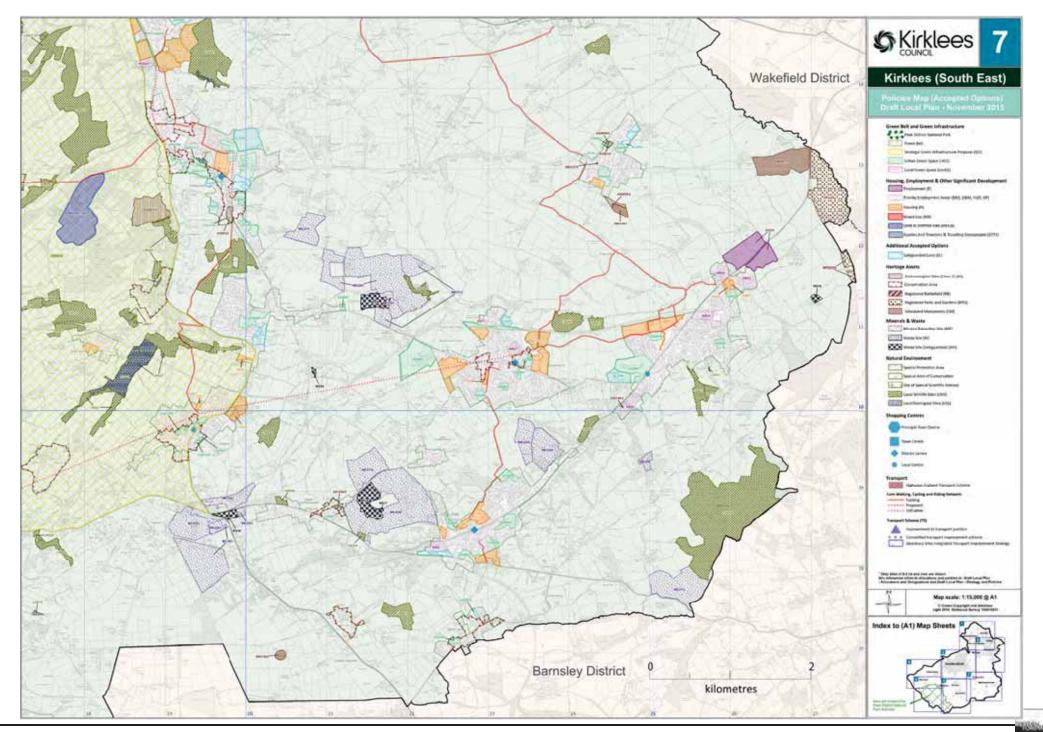
8.0 Bibliography

- [1] Visual Assessment of Windfarms (Scottish Natural Heritage, 2002).
- [2] National Character Areas Character Area 38: Nottingham, Derbyshire and Yorkshire Coalfield (Natural England, 2013).
- [3] Kirklees District Landscape Character Assessment, (Land Use Consultants on behalf of Kirklees District Council, July 2015).
- [4] Guidelines for Landscape and Visual Impact Assessment (Landscape Institute with the Institute of Environmental Management and Assessment, Third edition 2013).
- [5] Kirklees Draft Local Plan Green Belt Review and Outcomes, (Kirklees District Council, November 2015).
- [6] National Planning Policy Framework (Department for Communities and Local Government, March 2012).

Appendix A

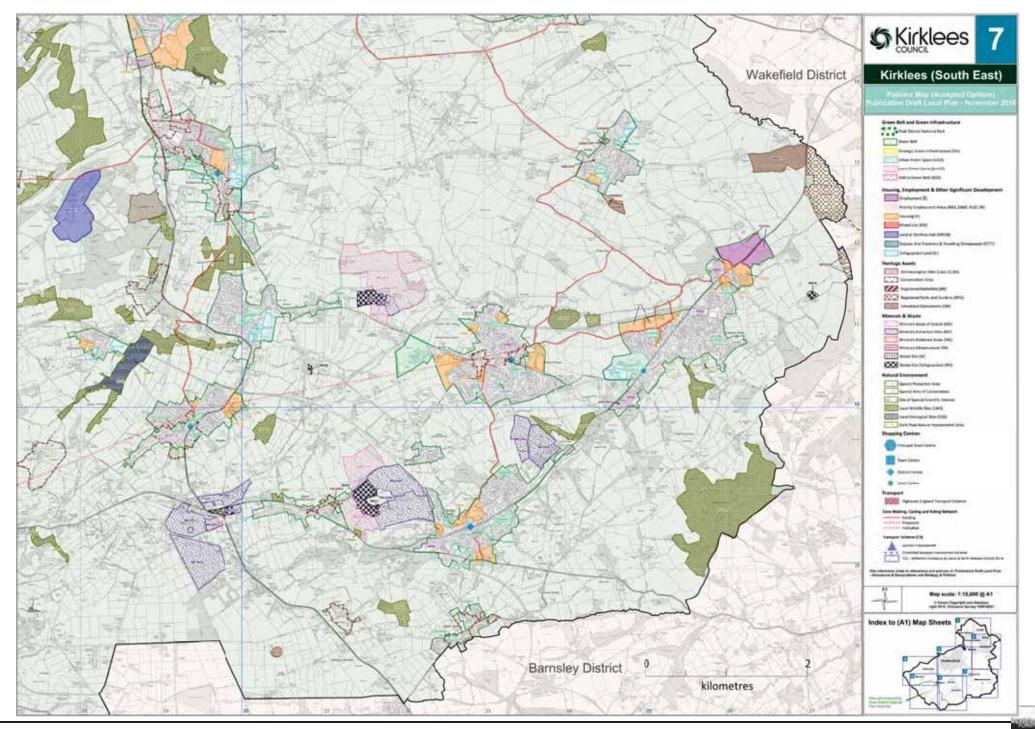
Kirklees South East Policies Map (Accepted Options)

Draft Local Plan November 2015



Appendix B

Kirklees South East Policies Map (Accepted Options)
Publication Draft Local Plan November 2016



Appendix C

ZTV Subtended vertical angle explanation

ZTV (Zones of Theoretical Visibility) Subtended Vertical Angle Explanation

The Zone of Theoretical Visibility (ZTV) shows the computer model prediction of the relative visibility of proposed site features using digital terrain data (Data typically used is OS Landform 'Panorma' contours data set).

The visual impact of a proposed development upon receptors is calculated by linking the vertical angle subtended at viewpoint (receptor eye point) by the top and bottom of the development (target area) within view.

This gives a measure of the field of view occupied by a proposed development from different receptor points, whilst taking in to account:

1. The effect that **distance** has upon the visibility of the development.



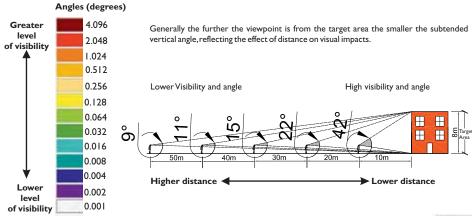
2. The effect that landform & relative height of the receptor has upon the visibility of a development. Landform that obstructs views of the development will lessen the angle of view and therefore reduce the visual impact of the development upon the receptor



However if a receptor was positioned on higher ground above a development, the angle of view will be increased.



The Zone of Theoretical Visibility figure represents receptors, assumed to be 1.6m above ground level, in a grid of 100m spacing. The subtended angle is calculated for each receptor point, the values are then combined with values of similar angles of view and assigned a colour as represented in the table below. Therefore the same colours in the plan represent areas with relatively similar magnitude of theoretical visibility.



The computer generated ZTV study is undertaken using a bare earth landform to give the worst case scenario. In reality, built structures and vegetation will reduce the actual visibility of the target area.



I:\Reference Library\LSS Instructions\Drawing Notes\ZTV Vertical Subtended Angle Notes

March 2013

Appendix D

Green Belt Edge Review (p. 15 - 18, Kirklees Draft Local Plan Green Belt Review and Outcomes, November 2015)

4. Green belt edge review

- 4.1 This section sets out in detail the methodology that was followed in undertaking a comprehensive review of the green belt edge and the land immediately adjacent to it, for the purposes of the preparation of the Kirklees Local Plan.
- 4.2 The green belt boundary was scrutinized to determine the degree of constraint along the edge and its immediate relationship to the green belt land it adjoins. Each length of edge was then subject to a number of tests to determine both the physical ability of the land immediately beyond it to accommodate development, as well as the degree to which that land performed a green belt role. The chosen boundary lengths are defined by reference to points where the nature of the boundary changes significantly. The extent of adjoining land taken into consideration depends on the features it contains and whether and how such features could form a new boundary. The tests do not attempt to establish specifically where new boundaries could be established.

Test 1

4.3 The first stage of the process ("test 1") identifies those lengths of green belt boundary which are constrained to the extent that there is no reasonable prospect of development taking place in the green belt adjoining the current boundary, or where there are features or land uses which are clearly best preserved or protected by their green belt designation. Test 1 consists of three assessments; topographical, physical and environmental.

Test 1a - Topography constraint - slope analysis

4.4 The topographical assessment is based on the degree of slope¹ and the occurrence of differences in slope along a boundary and within the adjoining land. Slopes <15% are considered to be no more than a minor constraint on development potential. Slopes of 15-20% are considered to represent a moderate constraint and slopes >20% a severe constraint unless they affect only a small part of the area under consideration.

Topography Constraint	Degree of slope	Assessment
None or Minor	<15%	None or minor topographical constraint
Moderate	<15-20%	Degree, amount and location of slope are not a
		fundamental constraint to development.
Severe	>20%	Topography is a constraint to development

Test 1b - Physical constraint

 1 Using OS 'Terrain' 5" digital elevation data; slope mapping was conducted using GRASS GIS and the OS Terrain data

- 4.5 The physical assessment takes account of the following factors:
 - Existing built form within and around the area under consideration
 - The presence of listed buildings, conservation areas, ancient monuments
 - Potential barriers such as roads, railways, rivers and canals, high voltage power lines
 - Mineral working or waste disposal in the vicinity.
- 4.6 The extent to which the presence of one or more of these features would inhibit development is judged to be minor, moderate or severe, taking into account the likely scale of development which would be possible in the area.

Physical constraint	Assessment
None/minor	No significant physical constraints to development
Moderate	Some degree of constraint that could be designed around or would
	otherwise not constitute a fundamental constraint.
Severe	Severe constraint that would be a fundamental constraint to
	development

Test 1c - Environmental constraint

- 4.7 The environmental assessment takes account of the following factors:
 - The presence of protected trees and ancient woodland
 - Areas designated for wildlife protection
 - Proximity of the Peak District National Park
 - Flood risk
 - Buffer zones related to hazardous installations, pipelines, power lines and landfill
 gas.
- 4.8 The extent to which the presence of one or more of these features would inhibit development is judged to be minor, moderate or severe, taking into account the likely scale of development which would be possible in the area.

Environmental	Assessment
Constraint	
None/minor	No significant environmental constraints to development
Moderate	Some degree of constraint that could be designed around or would
	otherwise not constitute a fundamental constraint
Severe	Severe constraint that would be a fundamental constraint to
	development

Outcome

- 4.9 ANY LENGTH OF GREEN BELT EDGE CONSIDERED TO BE SEVERELY CONSTRAINED BY EITHER SLOPE, PHYSICAL OR ENVIRONMENTAL FACTORS IS SHOWN MARKED 'BLACK' ON THE OUTCOMES MAP
- 4.10 Where any of the three assessments results in a "severe" constraint it is assumed that development will not be practical and/or acceptable in terms of visual impact and prominence, on wildlife and/or safety. These areas are not subject to further tests as it is likely that these areas would remain as green belt.

Test 2

4.11 The second stage of the process ("test 2") evaluates areas in terms of their contribution to the first four of the five purposes of green belt set out in NPPF paragraph 80. The fifth purpose, to assist in urban regeneration by encouraging the recycling of derelict and other urban land, is considered separately and the methodology used is set out in test 3.

Test 2a

- 4.12 Test 2a considers an area's importance in preventing neighbouring towns from merging into one another. This assessment considers:
 - The strategic significance of the wider green belt
 - The width of the current green belt gap and the risk that development would compromise that gap;
 - Whether development would appear to result in the merging of built-up areas.
- 4.13 The relative importance of an area's contribution to this purpose depends on the extent of the current separation of built-up areas and the degree to which an extension of development into green belt could be accommodated without significantly reducing separation from neighbouring built-up areas. The extent to which features such as slopes, tree cover or roads and railways would screen it so that there would be no significant appearance of merging was also considered.

Outcome

- 4.14 ANY LENGTH OF GREEN BELT EDGE CONSIDERED TO PERFORM A STRATEGIC ROLE IN PREVENTING THE MERGER OR THE APPEARANCE OF MERGER OF SETTLEMENTS IS MARKED 'RED' ON THE OUTCOMES MAP
- 4.15 Given the emphasis in NPPF paragraph 79 on green belts preventing urban sprawl by keeping land permanently open, it is assumed that if the impact of development on the merging of built-up areas is judged to be severe development of the area in question should not be considered. Consequently tests 2b, c and d are only applied

to areas not considered to be important in preventing the merger of neighbouring towns.

Tests 2b to 2d

- 4.16 Test 2b considers an area's importance in checking the unrestricted sprawl of large built-up areas taking into account:
 - The degree of containment potentially provided by the length and number of boundaries with the adjoining built-up area
 - The potential to contain development within a new green belt boundary which aligns with the current urban form
 - The presence of strong physical boundaries or landform which would contain an extension of development into the green belt.
- 4.17 The relative importance of an area's contribution to this purpose depends on the degree of containment that could be achieved; the greater the degree of containment that could be achieved the lower the importance of the area to restricting sprawl.
- 4.18 Test 2c considers an area's importance in safeguarding the countryside from encroachment. This involves assessment of the character of the land in relation to its surroundings, taking into account:
 - Whether the land is part of the open countryside or is separated or screened from the wider countryside by physical features
 - Whether the prominence of adjoining built-up edges gives the impression that the land is part of the urban fringe
- 4.19 The more that an area appears to relate to an urban edge rather than open countryside or is screened from the wider countryside the less will be its importance in achieving this purpose.
- 4.20 The fourth green belt purpose is to preserve the setting and special character of historic towns. There are no historic towns in Kirklees but the area has many historic features evidenced by the presence of ancient monuments, listed buildings and conservation areas. Test 2d considers whether an area contains or relates to a historic asset and assesses the degree to which development would be prejudicial to that asset or its setting.

Outcome

4.21 The outcomes of tests 2b, c and d are combined in a matrix, shown in Appendix 3, which indicates the relative harm to green belt purposes that would result from development. Greater weight is given to avoiding harm through checking unrestricted sprawl because of the emphasis on this in NPPF paragraph 79. Areas

GREEN BELT REVIEW AND OUTCOMES

score from 1, having least importance in achieving green belt purposes to 5, having most importance.

Summary of colours and numbers for tests 1 to 2d:

Black	Test 1 indicates that there may be a significant constraint to development, caused by an absolute barrier to development along the edge (railway line for example)				
	or that the land immediately adjacent to the edge is significantly constrained				
	(severe slope, and	pe, ancient woodland for example)			
Red	Test 2a indicates that the green belt is performing a strategic role such that				
	development may result in the merging of settlements.				
Importa	nce of green belt ro	ple based on combination of tests 2b to 2d where the site			
'passes'	tests 1 and 2a;				
1	Less important (dark green)				
2		(light green)			
3	(light yellow)				
4		(dark yellow)			
5	More important (pink)				

4.22 THE RESULTS FOR EACH LENGTH OF GREEN BELT EDGE SUBJECT TO TESTS 2b TO 2d

ARE SHOWN MARKED FROM GREEN TO PINK ON THE OUTCOMES MAP

<u>Test 3: assessing parcels of brownfield land against the purpose of including land in</u> the green belt

- 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". The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open, and on a strategic level it does this by channelling development into urban areas. Yet the green belt contains within it parcels of land which can be said to be previously developed under the terms of Annex 2 of the NPPF. For the purposes of this exercise, these parcels of land are assumed to have an urban land use. If these parcels of land already contain built development it may be possible to recycle or re-use the land under the terms of existing green belt policy, subject to consideration of the impact on openness. The presence of the green belt in these circumstances is not an impediment to re-use. However, in instances where the previously developed land does not contain built form and new development would impact on openness and therefore be inappropriate, the presence of the green belt may prevent its re-use if there are no other overriding circumstances that would warrant its redevelopment. In these cases, the green belt could be seen to be failing in its purpose to encourage the recycling of land by preventing another use coming forward.
- 4.24 It is possible therefore to interpret purpose 5 in both a strategic and a more local manner. The strategic interpretation of purpose 5 is that 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. On the more local level however, there may still be

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Appendix 3: Assessment Matrix

GREEN BELT ASSESSMENT MATRIX

Degree of importance of green belt role				
Less important		Moderately		Important role
role		important role		
1	2	3	4	5

Green Belt Purpose			Assessment
Checking unrestricted sprawl of built up areas	Safeguarding countryside from encroachment	Preserving setting & special character of historic towns	conclusion: green belt role points
Less important	Less important	Less important	1
Less important	Less important	Moderate	2
Less important	Less important	Important	3
Less important	Moderate	Less important	2
Less important	Moderate	Moderate	3
Less important	Moderate	Important	3
Less important	Important	Less important	3
Less important	Important	Moderate	3
Less important	Important	Important	4
Moderate	Less important	Less important	2
Moderate	Less important	Moderate	3
Moderate	Less important	Important	3
Moderate	Moderate	Moderate	3
Moderate	Moderate	Less important	3
Moderate	Moderate	Important	3
Moderate	Important	Important	4
Moderate	Important	Less important	3
Moderate	Important	Moderate	3
Important	Less important	Less important	4
Important	Less important	Moderate	4
Important	Less important	Important	5
Important	Moderate	Less important	4
Important	Moderate	Moderate	4
Important	Moderate	Important	5
Important	Important	Important	5
Important	Important	Less important	5
Important	Important	Moderate	5





APPENDIX 6

HERITAGE APPRAISAL

Bretton Hall (Clayton West Site Promotion) Heritage Appraisal

January 2018



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Appe	endix 2: Listed Buildings within RPG Boundary	

1. Introduction and Background

- 1.1 This Heritage Appraisal (the 'Appraisal') has been prepared by Turley Heritage on behalf of Clayton West Development Company Limited ("CWDCL"). The purpose of the Appraisal is to provide an assessment of the significance and setting of Bretton Hall Registered Park and Garden (the 'RPG') to inform the Examination in Public (EiP) process in relation to the proposed allocation of the Clayton West employment site. This is comprised of the CWDCL land and the E2333a land and is referred to in this report as the 'proposed allocation site'.
- 1.2 The proposed allocation site is identified for employment uses in the Kirklees Publication Draft Local Plan which was submitted to the Secretary of State on 25 April 2017.
- 1.3 This Appraisal focuses on the Bretton Hall RPG which is located between 1.5 and 3km east of the proposed allocation site. This Appraisal is informed by and refers to the 'Landscape Statement' document which was prepared by Smeeden Foreman Ltd in April 2017.
- 1.4 This Appraisal has been informed by a site visit undertaken on 17 January 2017 and a desk based research.

Background

- 1.5 Following the identification of the Clayton West site for employment use in the Kirklees Publication Draft Local Plan, discussions have been undertaken between Kirklees Council, Historic England (HE) and QUOD Planning to consider any potential impacts of development at the proposed allocation site on designated heritage assets, in particular Bretton Hall RPG itself and associated assets.
- 1.6 As aforementioned, a 'Landscape Statement' document was prepared by Smeeden Foreman and this identifies a series of viewpoints from the RPG towards the proposed allocation site. This document has been shared with HE. The minutes of a meeting held on 8 August 2017 record the following:
 - "it was confirmed by IS (Ian Smith, Historic England) that Historic England agreed with the outcomes [of the Landscape Assessment] in relation to the potential impact on the medieval ironstone pits of Bentley Grange, as well as the conclusions in relation to the principal building of Bretton Hall, and the grade II listed cascade bridge. However IS confirmed that because an impact from viewpoints 01, 02, 02D and 05 had been identified then Historic England's view is that further work is needed to fully establish the level of harm that the development might cause and what mitigation measures might be used to remove or reduce that harm".
- 1.7 Following this meeting it was agreed that new Zone of Theoretical Visibility (ZTV) maps would be prepared from the four viewpoints identified to further understand the visual impact of specific building heights and potential mitigation through landscaping. As stated HE identified that further work was required to establish the level of harm that the development might cause to the RPG. Therefore the purpose of this Appraisal is to

- consider the significance of the Bretton Hall RPG including the contribution of setting, and to provide an assessment of the potential impact on that significance of development at the proposed allocation site, with reference to the viewpoints prepared by Smeeden Foreman.
- 1.8 Chapter 2 of this Heritage Appraisal identifies the heritage assets with the potential to be affected by development at the proposed allocation site. Chapter 3 sets out historic map regression and chapter 4 provides a description of the significance of the relevant assets and an assessment of the contribution of setting. Chapter 5 provides an assessment of the specific contribution made by the proposed allocation site and of Viewpoints prepared by Smeeden Foreman where the potential for visual impact has been identified. A summary and heritage recommendations are provided at Chapter 5.

2. Heritage Assets

2.1 The NPPF (2012) defines a heritage asset as:

"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest."

Registered Park and Garden (RPG)

- 2.2 The main purpose of the Register of Parks and Gardens is to identify designed landscapes of special historic interest. Whilst there is no additional statutory protection arising from inclusion on the register it is a 'material consideration' in the planning process, meaning that planning authorities must consider the impact of any proposed development on the landscapes' special character. The principles of selection for registered parks and gardens are set out in the Historic England Rural Landscapes: Register of Parks and Gardens Selection Guide (Second Edition December 2017).
- 2.3 The Bretton Hall RPG is designated at Grade II. The map at figure 3.1 shows the extent of the designation.

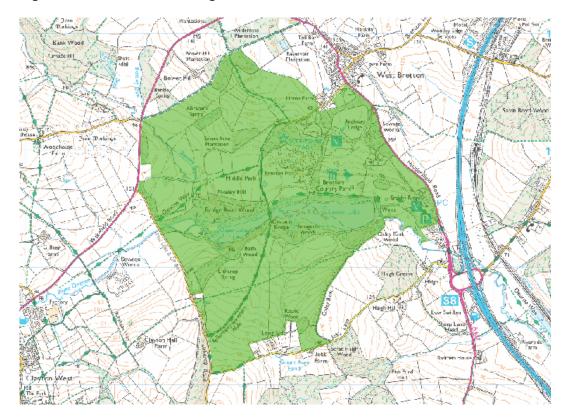


Figure 2.1: Bretton Hall Registered Park and Garden

2.4 The RPG is located in South Yorkshire approximately 9km to the south west of Wakefield, and 15 km south east of Huddersfield. It comprises the former defined landscape parkland associated with Bretton Hall, and within the boundary are a large

- number of listed buildings. As set out at paragraph 1.3 of this report, the proposed allocation site is located between 1.5 and 3km east of the RPG.
- 2.5 Much of the east side of the RPG is now in use as the Yorkshire Sculpture Park (YSP).
- 2.6 As set out at paragraph 2.3 HE has advised that there are likely to be visual impacts upon the RPG as a result of development at the proposed allocation site. The principal consideration for this Heritage Appraisal is therefore the effect of development at the proposed allocation site on the significance of the RPG through development within its setting.

Listed Buildings

- 2.7 Listed buildings are defined as designated heritage assets that hold architectural or historic interest. The principles of selection for listed buildings are published by the Department of Culture, Media and Sport and supported by Historic England's Listing Selection Guides for each building type.
- 2.8 As set out at paragraph 1.7 of this report HE has advised that there will be no impact on Bretton Hall (grade II*) or the Cascade Bridge (grade II) as a result of development at the proposed allocation site. These assets are therefore excluded from this appraisal.
- 2.9 In addition to Bretton Hall and the Cascade Bridge there are a large number of other listed buildings within the RPG and these are listed in the table at Appendix 2. It is not considered that the development of the proposed allocation site would affect the significance of any of these assets due to; the lack of visibility between the assets and the proposed allocation site resulting from topography and intervening wooded areas; the nature of the significance of the assets, and the lack of known functional or other historic associations that would suggest the proposed allocation site contributes to the significance of these assets, and they are therefore excluded from further assessment.

Scheduled Ancient Monument

2.10 The 'iron mining shaft mounds and medieval earthworks south of Bentley Grange Farm' is a scheduled monument located approximately 500m from the proposed allocation site. As set out at paragraph 1.7 of this report HE has confirmed that they agree with the conclusions of the Landscape Statement that there will be no harmful impact upon the scheduled monument. It is therefore excluded from further assessment.

3. Historic Map Regression

- 3.1 A series of historic maps are provided at Appendix 2. A brief description of the development of the park as shown in these maps is provided below:
 - In c.1849-51, the Bretton Hall grounds included Middle Park to the west, the Upper and Lower Lakes to the south and bands of surrounding woodland planting. To the east of the house was open parkland. To the south of the lakes, the area was identified as Long Side and further to the south the parkland was bounded by Jubb Plantation and to the east by Oxley Bank.
 - An approach route was aligned east to west terminating at the hall to the east.
 This appears to have branched off at the open parkland to the north and south, with a continuation to the west. There was also an approach from the north lodge which reached the house from the north west. To the west of this lodge Lodge Houses was marked.
 - Dispersed tree planting surrounded the hall to the south and west, with a
 network of routes through the grounds to the west. A fountain was located to
 the north west of the hall, and the stable range to the north. Thick woodland
 was planted to the north of the hall.
 - To the north of the hall, beyond the woodland planting, were formal gardens
 with a small rectilinear Gardener's Cottage and sheds and the North Lodge to the
 north west. Menagerie Wood and Keeper's Wood and Kennels were identified to
 the south of Lower Lake, and Bath Wood was identified to the south of Upper
 Lake.
 - By **1891**, the thick woodland planting to the north of the hall appears to have been reduced, along with the approach route branch south of the open parkland and hall. The open parkland was identified at this time as Deer Park. The stables appear to have been altered to form a courtyard.
 - The rectilinear structures to the south of the formal gardens appear to have been demolished and this is shown as a large open space. The distinction between the formerly open parkland to the east and the wooded areas became less distinct as the woodland was reduced.
 - By the **early 20**th **century**, the woodland appears to have been further reduced. By this time, Icehouses had been added to the north of the stables. There is little discernible change in c.1930 to the grounds.

4. Assessment of Significance

Introduction

4.1 The NPPF defines the significance of a heritage asset as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting".

4.2 NPPF Paragraph 132 sets out that:

"Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting"

4.3 Paragraph 009 of Planning Policy Guidance sets out that:

"Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals"

Setting

4.4 The NPPF defines the setting of a heritage asset as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral".

Historic England Good Practice Advice in Planning Note 3 (Second Edition) (December 2017) 'The Setting of Heritage Assets'

- 4.5 Historic England has recently published revised guidance relating to the setting and views of heritage assets. The document gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides advice on how views play a part in setting. It suggests a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets.
- 4.6 The guidance clarifies that there can be a distinction between views that are valued for reasons other than their contribution to heritage significance such as reasons of landscape character or visual amenity.
- 4.7 It states that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. It also

clarifies that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.

- 4.8 Paragraph 8 states that extensive heritage assets, such as historic parks and gardens, can include many heritage assets, historic associations between them and their nested and overlapping settings, as well as having a setting of their own.
- 4.9 Paragraph 9 of the draft guidance states that setting is not itself a heritage asset. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance. It also states that the setting of an asset can change over time, and understanding this history of change will help determine how further development within an asset's setting is likely to affect the contribution made by setting to the significance of the heritage asset.
- 4.10 Paragraph 9 refers to designed settings in relation to parks and gardens:

"A park may form the immediate surroundings of a great house, while having its own setting that includes lines-of-sight to more distant heritage assets or natural features beyond the park boundary. Given that the designated area is often restricted to the 'core' elements, such as a formal park, it is important that the extended and remote elements of the design are included in the evaluation of the setting of a designed landscape...

The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary. It can include:

- land which is not part of the park or garden but which is associated with it by being adjacent and visible from it
- land which is not part of the site but which is adjacent and associated with it because it makes an important contribution to the historic character of the site in some other way than by being visible from it, and
- land which is a detached part of the site and makes an important contribution to its historic character either by being visible from it or in some other way, perhaps by historical association"
- 4.11 The guidance highlights a series of other considerations that can be relevant to assessing the impact of development such as 'change over time', 'cumulative change', 'access and setting', 'buried assets and setting', 'designed settings', 'setting and urban design' and 'setting and economic viability'.
- 4.12 It is identified within the guidance that views which contribute more to understanding the significance of a heritage asset include the following:
 - Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.

- Those where town- or village-scape reveals views with unplanned or unintended beauty.
- Those with historical associations.
- Those with cultural associations.
- Those where relationships between the asset and other heritage assets or natural features or phenomena are particularly relevant.
- 4.13 As set out above, a staged approach to assessment is advocated involving identification of the assets that may be affected, assessing the degree to which setting makes a contribution to the significance of the heritage asset or allows significance to be appreciated, assessing the effects of the proposed development and exploring ways to maximise enhancement and avoid or minimise harm.
- 4.14 In assessing the degree to which these settings and views make a contribution to the significance of the heritage assets or allow significance to be appreciated, the key attributes of the heritage asset should be addressed and then the following considered:
 - The physical surroundings of the asset and its relationship with other assets;
 - The asset's intangible associations with its surroundings, and patterns of use;
 - The contribution made by noise, smells etc to significance; and
 - The way views allow the significance of the asset to be appreciated.
- 4.15 The Step 2 Checklist provides a list of potential setting attributes that may help to elucidate its contribution to significance under the headings 'The asset's physical surroundings' and 'Experience of the asset'. The Step 3 Checklist provides a list of potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset including the 'Location and siting of development', the 'Form and appearance of development', 'Wider effects of the development' and 'Permanence of the development'.

Historic England Rural Landscapes: Register of Parks and Gardens Selection Guide (Second Edition December 2017)

- 4.16 The Rural Landscapes: Register of Parks and Gardens Selection Guide second edition was published by HE in December 2017. The Guide identifies that although registration is a statutory designation, there are no specific controls for registered parks and gardens, however the NPPF gives registered parks and gardens an equal status with listed buildings and scheduled monuments.
- 4.17 The guide provides a summary of the historic development of garden landscapes and key themes and features found in gardens of each period.

4.18 The guide sets out that:

"all sites included on the Register of Parks and Gardens must hold a level of significance defined as 'special historic' interest in a national context."

4.19 Nine general criteria have been identified which are used in assessing candidates for the register:

"Date and rarity:

- Sites formed before 1750 where at least a significant proportion of the principal features of the original layout is still in evidence
- Sites laid out between 1750 and 1840 where enough of the layout survives to reflect the original design
- Sites with a main phase of development post-1840 which are of special interest and relatively intact, the degree of required special interest rising as the site becomes closer in time
- Particularly careful selection is required for site from the period after 1945
- Sites of less than 30 years old are normally registered only if they are of outstanding quality and under threat

Further considerations

- Sites which were influential in the development of taste whether though reputation or reference in literature
- Sites which are early or representative examples of a style of layout or a type of site, or the work of a designer of national importance
- Sites having an association with significant persons
- Sites with strong group value with other heritage assets"
- 4.20 Specific considerations for the registration of rural landscapes are provided and summarised below:
 - **Documentation** the well-documented creation or development of a site is likely to add to its interest.
 - **Group value and listing** if a contemporary house exists this will strengthen the case for designation, and so too will the presence of garden buildings and structures.
 - The natural landscape the natural advantage and beauty of the natural landscape will be set aside and the design concept, and its implementation and survival, will be assessed. Where the natural landscape has been deliberately appropriated as a principal feature of the design, this will be a factor.

- Authenticity Especially where a house has remained at the focal point of a
 designed landscape, its gardens, pleasure grounds and parkland will have seen
 change. Change through routine works is unlikely to have had a detrimental
 effect on the character of the landscape, whereas unsympathetic restoration
 may have.
- **Condition** poor condition does not exclude a site from consideration; where the overall design or layout remains sufficiently intact.
- **Planting** the register is concerned with structural design elements in the landscape rather than planting schemes themselves.
- **Archaeological interest** it will only exceptionally be the case that enough is known about it for inclusion in the register.
- Deer parks few deer parks survive intact; fundamental considerations will be the survival of the interior, with woods, trees, and grassland intact, and unenclosed for agriculture. The presence of lodges and shelters will add to interest, as will the survival of the principal house.
- 4.21 The following assessment of significance is proportionate to the importance of the identified heritage asset and sufficient to understand the impact of development at the proposed allocation site given its nature and extent.

Assessment of Significance of Bretton Park Registered Park and Garden

Historic Interest

- 4.22 The Bretton Park estate was owned by the Dronsfield family during the 13th century before being passed, through marriage, to the Wentworths in 1407. The Wentworth family, who also owned the vast Wentworth Woodhouse and Wentworth Castle estates, owned the site for four hundred years until 1792.
- 4.23 The first recorded house was constructed at the site in 1508; a timber framed building which appears on the Saxtons map of Yorkshire in 1577. The hall is thought to have been damaged by fire and was largely demolished by the 1730's.
- 4.24 Sir William Wentworth had the present Bretton Hall constructed in around 1720. It was likely designed by Colonel James Moysner, who also constructed Nostell Priory. It is thought courts and pleasure grounds were originally laid out around the house but these have since been lost. The grounds were further developed with features and follies including a Chapel in 1744 and pheasantries in 1748, both to the east of the hall, though the landscaping of the park was not extended in that direction at that time.
- 4.25 When Sir William died in 1763 the estate was passed to Sir Thomas Wentworth. The landscaped parklands surrounding Bretton Hall are thought to have been designed for Thomas Wentworth by Richard Woods, likely between 1765 and 1775. He laid out the basic garden landscape, including the upper and lower lakes, created by damming the River Dearne, and surrounding pleasure grounds, potentially one or more bridges and a kitchen garden and areas of principal planting. In 1782 a new stretch of park was developed to the east with the inclusion of a deer shelter.

- 4.26 During the 1790's the cascade and triple arched balustrade bridge and Bretton Lodge were constructed, possibly by the architect William Lindley of Doncaster.
- 4.27 The main composition of the estate appears to have been largely complete by 1880 but later generations continued to alter and add to the landscape. Thomas bequeathed the estate to his illegitimate daughter Diana when he died in 1792, and she later remodelled the house. She also added more features to the estate including the Archway Lodge and undertook much additional planting of park and woodland areas. A large camellia house conservatory was constructed for Diana by Wyatt in 1812.
- 4.28 During the 1820's Robert Marnock, the well-known park and garden designer, was taken on as head gardener at Bretton and his tenure lasted from 1829-34. He is thought to have designed botanical gardens and glasshouses for which Bretton became well known; though these are now lost.
- 4.29 When Diana died the house passed to Thomas Wentworth Beaumont, her son, who sold much of the contents of the house and redesigned parts of the gardens and parklands, also with the help of Robert Marnock. In 1842 the stables were constructed, in a position visible from the approach to the mansion from the east side. In 1871 the Camellia House was rebuilt, and ice houses were added.
- 4.30 During WWII the house was requisitioned by the war office and in 1948 the house and 260 acres were sold to West Riding County Council. Beaumont Drive, a line of trees along the north access drive, was created in 1982.
- 4.31 In 1949 a college was opened at the site, later merging with the University of Leeds before being sold to Wakefield Council in 2007. Some landscape features were lost during the 20th century associated with the expansion of the college.
- 4.32 In 1977 YSP opened with a grant of £1000 from Yorkshire Arts; the remaining country parkland was purchased from the council in 1977. In 1997 the pavilion gallery and a new entrance road and car park were constructed, and in 1998 237 acres of former hunting grounds and pasture were added to the park. Many of the historic parkland features have been incorporated into the parkland used as temporary or permanent sites for artworks.

Parkland Features and Buildings

4.33 The designated area is spread across the Dearne Valley and uses natural topography to effect. A line of lakes is located across the lowest point of the valley and the valley sides are laid with wooded areas and open parkland, itself interspersed with buildings and features. The topography and design of the composition allows for a variety of experiences, including secluded wooded lakeside walks and contrasting grand open views of the estate in the landscape.

Lodges and access routes

4.34 The RPG has four main entrance routes, each of which has a related lodge building. Archway Lodge is to the north east and adjacent to the present principal access road into YSP which curves south and east towards the car park. This large stone triumphal arch is no longer used for access and stands alone as a monument; resonating with the artworks interspersed elsewhere in the estate. Further north is Bretton Lodge (also

known as the North Lodge, and identified as Avenue Lodge in historical mapping), which is adjacent to Park Lane, at the north eastern extent of the designated boundary. Sources suggest that this was the original principal vehicular access into the site, it curves to the south west to return towards the rear of Bretton Hall; historic maps indicate that this road was lined by an avenue of trees in 1891. Beaumont Drive (which as aforementioned was lined with trees during the 1980's) travels south towards Bretton Hall and appears to follow a route identified by an avenue of trees in the 1891 map. To the south west is Hoyland Lodge.

4.35 Whilst the Lodge buildings and associated access routes contribute towards the overall significance of the RPG through emphasising the scale and grandeur of the estate and acting as visual gateways marking arrival into the park, it is noted that change has reduced the overall historic authenticity of the present arrival routes into the parkland and altered the function of the lodges.

Lakes and parkland

4.36 The RPG can be considered in three discrete parts. Centrally within the designated area is Bretton Hall and the Bretton Country Park, which principally comprises the central lakes and surrounding wooded areas as well as the sloping land to their north, which contains Bretton Hall itself and a large number of artworks associated with the YSP, as well as the YSP visitor centre. To the north and east of this area, outside the boundary of the YSP, is an area known as Middle Park which is principally grazing land interspersed with wooded plantations. To the south is an area of similar characteristics, known as Long Side.

Bretton Hall and Country Park

- 4.37 The Bretton Hall and Country Park area is the part of the park in which the designed landscaping work of Richard Woods in the 18th century and Robert Marnock in the 19th century, as well as others, is principally legible. Bretton Hall is centrally located and forms a clear focal point in views throughout this section of the park. To the south frontage of Bretton Hall is a terraced area with retaining walls and balustrades, below which are lawns which slope down towards Lower Lake in a 'natural' style. This provides a clear open area from which the south frontage of the house can be appreciated; and emphasises the importance and centrality of the house to the estate. To the west side of the hall is an expansive and gently undulating lawned area which is today interspersed with artworks associated with YSP and some mature trees.
- 4.38 To the east side of the Hall is a grassed area which steeply slopes south towards the lakes. Historical maps identify this area as the Deer Park, and identify that the principal historic access route to the house crossed this area from the east to west running from the Archway Lodge and travelling south and east through the estate to approach the west side of Bretton Hall. The southern part of this route remains but is no longer in regular use since the road through Archway Lodge was closed. A wooded area to the east side of the house restricts all but glimpses of views of the house from this part of the park; historically open views of the east front of the house would have been available and this would have been an important view on the approach to the house. The Bretton estate church is located in this area and is situated in a walled churchyard; this is also now enclosed by trees. Views from this area are focused to the south towards the lakes, however there are also more distant views to the south east

- towards the surrounding raised landscape, which is principally rural agricultural fields interspersed with wooded areas, though distant views are available of built development of Barnsley in the distance.
- 4.39 The northern side of this area contains the YSP visitor centre and associated group of buildings used for galleries and servicing. This area incorporates historic buildings and successfully integrates modern additions into the landscape. Due to topography and tree cover this complex is not visible from the majority of the surrounding parkland.
- 4.40 The Upper and Lower Lakes bisect the central part of the designated area and are divided and crossed by a number of picturesque bridges including the Central Cascade Bridge which incorporates a cascade, a weir at the east and a smaller footbridge to the south side. The use of a central lake, often contrived to appear as a natural feature curving through the park, was a typical feature of the 'natural' mid-18th century designed landscape¹. The lakes are formed across the bottom of the valley which crosses the parkland east to west and form an important central feature; focusing views from the north and south. The lakes are fed by The Cut which is a narrow channel formed by the damming of the River Dearne to create the lakes, which runs to the north of the water; this feature forms an interesting addition to the garden, emphasising the variety of features.
- 4.41 The lakes are enclosed by wooded areas which are laid with footpaths; these routes contribute towards the variety of experiences within of the park. Quiet and enclosed wooded paths lead to occasional features and follies which are secluded within quiet areas, creating areas of contemplation. They also occasionally open to reveal striking framed prospects across the lake towards Bretton Hall and the surrounding parkland, emphasising the scale and grandeur of the estate. The use of 'ornamental wildernesses', filled with networks of paths, was a typical feature of designed landscapes laid out in the late 17th and early 18th centuries².
- 4.42 To the park boundaries are surviving stone gateposts which delineate the former expanse of the parkland and emphasise its status.

Long Side

4.43 Sloping up from the lakes to the south is an open area of grazing known as 'Long Side'. It is used for pasture and divided into fields by fences and trees to boundaries. This area has a very different quality to that of the Bretton Country Park; it is more informal, open, and is divided by fencing and hedges into agricultural fields. As the land rises, expansive views looking north back across the valley reveal Bretton Hall set within its surrounding buildings and parkland. This is one of the few areas where a clear view of the hall and its surrounding buildings is available and the view contributes towards an appreciation of the scale and quality of the parkland, and the important connected buildings within it.

Middle Park

4.44 To the north and west side of the hall is 'Middle Park' which is of similar character to Long Side. This area may have originally been part of the deer park. It is now outside

¹ Historic England (March 2013), Rural Landscapes: Register of Parks and Gardens Selection Guide

² Historic England (March 2013), Rural Landscapes: Register of Parks and Gardens Selection Guide

the YSP boundaries and is largely in use as agricultural grazing; it is divided by fences and interspersed by mature trees. An avenue of trees encloses a path from the north west where stone gateposts define the park boundary towards the North Lodge. 'Bella Vista', an 18th century tower, was formerly positioned at the high point. Due to the topography of the valley and mature trees in the area there are no views into the landscaped area of Bretton Country Park from this part of the RPG, there are clear views to the east and south, across the designated area and into the wider landscape, and particularly to the south east there are views of built development around the settlement of Clayton West in the distance.

Principal buildings and monuments

- 4.45 The principal building in the park is Bretton Hall (grade II*) which was originally constructed in the 1720's by Sir William Wentworth but has been progressively altered and enlarged by generations of the Wentworth family. The house retains its original Palladian form but was later transformed into a grander and much larger classical building with the addition of a bow front to the south which, along with terracing, adds a prominence to this elevation. To the rear is an orangery and stable range and since its conversion for educational use a large number of 20th century buildings have been constructed to the north and east. The Hall represents the focal point of the designed and landscaped garden and its survival at the centre of the garden contributes towards the appreciation of the historic character of the estate and towards its overall authenticity and significance.
- 4.46 The use of a sparing collection of buildings, adding interest and variety, is typical of the mid-18th century landscape³ and Bretton provides a good example of this approach. A chapel dating to 1744, and constructed for Sir William Wentworth is located in the County Park to the east side of Bretton Hall; it is built into a plateau in the sloping landscape and is surrounded by trees, which restrict visibility of it. To the east side of the chapel is the Peasantries, constructed in 1749, also by Sir William Wentworth; these buildings were constructed as residences for gamekeepers. The group of lodges marking access routes is discussed above.
- 4.47 Throughout the estate are also smaller scale historic features and structures which add interest to the experience of the park. This includes a grotto with remnants of shell decoration, a Greek temple and obelisk. These historic features are of interest and contribute to the overall significance of the RPG as part of the formal composition.
- 4.48 The later additions to the park by the YSP, including individual contemporary artworks and sculptures and some alterations to the existing historical structures to form artworks align with the historic approach of locating individual features of interest throughout the park.
- 4.49 Whilst the principal buildings and other structures within the estate are of individual special interest and are often listed in their own right, as a group of structures appreciated collectively throughout the estate, they make a substantial contribution to the overall significance of the RPG; their survival enhances the historic authenticity and

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³ Historic England (March 2013), Rural Landscapes: Register of Parks and Gardens Selection Guide

integrity of the composition and emphasises the historic character, status and quality of the historic estate and its residents.

Setting

Physical surroundings

4.50 Country Life described the siting of the park in 1938 as follows:

"Wakefield is some seven miles to the north-east, Barnsley about the same distance to the south east; but Bretton might be in a different world were it not for the tell-tale soot on the trees and grass and the veiling of the skies that are seldom entirely clear. Hills close in on either side of the valley in which the house stands, on the north side of a great lake formed by the damming of the Dearne, a little stream flowing southeastwards to join the Don above Doncaster. Far down the valet the smoke of Barnsley may be seen, but the park of Bretton surrounds the house on all sides and covers the hills north to the north and south⁴"

- 4.51 The RPG encompasses a broad swathe of landscape focused on the Dearne Valley and its north and south slopes. It is bounded to the east by Huddersfield Road (A637) and beyond the M1 motorway and to the south east and south by the landform Oxley Bank and Jebb Lane. To the west the boundary is defined by Litherop Road and to the north by a footpath and field boundaries which adjoin West Bretton village to the north east.
- 4.52 The M1 motorway travels north-south a short distance to the east of the designated area but due to topography, trees and distance any views or experience of this feature are restricted to the far eastern boundary of the designated area.
- 4.53 To the north east of the designated area is the small traditional settlement of West Bretton, and some small farmsteads and dwellings are located around the site boundary.
- 4.54 The landscape surrounding the RPG provides a strong context of agricultural land with interspersed wooded areas, however this is interrupted by roads, including the M1, and visible areas of built development, including Barnsley to the south-east and Clayton West to the east.

Intangible relationships with surrounding land and pattern of use

- 4.55 An historic and functional association is likely to exist between the village of West Bretton and the estate. The village is likely to have historical and functional association with the running of the estate, and estate workers are likely to have lived in the village. A grade II listed house (Estate House) in West Bretton was constructed for the estate in 1840 and was originally occupied by the estate land agent.
- 4.56 There is likely to be a functional and historic association between the estate and surrounding farmsteads and farmland. The estate may have owned surrounding agricultural land. A resonance exists between the agricultural uses inside the estate and in the surrounding area.

⁴ Country Life (May 21, 1938) Bretton Park, Yorkshire

4.57 The estate has an historic association with the estates of Wentworth Woodhouse and Wentworth Castle; the Wentworth family at Bretton were related to the Wentworths of these estates.

The way views allow the asset to be appreciated

- 4.58 The composition and arrangement of the designed parts of the park defines a landscape which is broadly inward-looking. The principal designed views and vistas within the site are created by connecting features and elements which are within the designated boundary, for example the view from the southern side of the valley at Long Side towards Bretton Hall, from the south side of the lake looking north towards Bretton Hall, and from the north valley side towards the lakes. These internal views are an important aspect of the composition. Many designed landscapes utilised specific features outside their boundaries as viewcatchers and focal points, but this device is not used at Bretton. Views of the surrounding landscape are generally experienced as an incidental backdrop to the park itself emphasising the rural nature of the landscape in which the park is positioned.
- 4.59 Much of the central 'Bretton Country Park' part of the designated area, where the designed nature is most evident, is set within the lower parts of the valley. Views from this area to the south-east encompass land which is outside the designed RPG boundary. Much of this land is open meadows and grazing land which is divided into fields by hedgerows and interspersed with wooded areas and scattered buildings including traditional residential buildings and larger more recent agricultural units. In more distant views to the south east an area of urban settlement at Barnsley is visible in the raised landscape, emphasising the mixed character of this area of South Yorkshire. Views to the west in this area are largely restricted by the belt of mature trees which has developed to the east side of Bretton Hall, though the Emley Moor TV mast is visible rising above the trees.
- 4.60 The northern parts of the 'Middle Park' area are raised at the north side of the valley and benefit from expansive views of the surrounding landscape beyond the designated area to the north east, east and south east. These views encompass an undulating landscape which, whilst principally rural and divided by field boundaries and interspersed with trees, includes visible areas of urban development, including Clayton West and the Emley Moor mast. These views emphasise the rural setting of the RPG and the broad functional connection between the grazing meadows of the northern part of the parkland and immediately surrounding landscape. Views of urban development emphasise that whilst the immediate landscape is rural, there is urban context in the surrounding landscape.
- 4.61 Views from the southern part of the designated area are focused to the north by the slope of the valley and enclosing trees towards the focal point of Bretton Hall itself. Due to topography, views to the east and west are restricted to the designated parkland; views to the north encompass the designated area of the estate with a backdrop of further agricultural or grazing land. These views serve to emphasise the overall rural character of the landscape which surrounds the parkland.

Summary of significance and setting

4.62 The significance of the RPG can be summarised as follows:

- The grade II* Bretton Hall RPG is of substantial interest as an 18th and 19th century designed parkland. Whilst the present landscape is borne of continual change and remodelling over time by different generations of owners and designers, a significant proportion of the principal features remain and are legible.
- The composition of the key features of the estate, including the lakes, wooded areas with pathways, bridges and access routes and lodges, are representative of the 18th and 19th century parkland and are an important aspect of special interest. Garden buildings and features, including the grotto and temple and deer shelter, are typical of 18th and 19th century landscapes and contribute towards the variety of experiences in the park and the overall composition and are of interest.
- The survival of the grand house at the centre of the park contributes towards the overall authenticity of the parkland and forms an important central focal point around which the gardens are designed.
- Designed views and vistas within the parkland make a substantial contribution to significance emphasising the quality of the composition and contributing towards a variety of experiences within the parkland.
- Later change, including the re-alignment of access roads and growth of wooded areas, has reduced the authenticity of the original composition to a degree, and resulted in the loss of some important aspects of the estate, for example the experience of the approach to and view of the hall from the east.
- The parkland has an association with important garden designers who worked on it, including Woods and Robert Marnock. An important association with notable families who owned the estate exists, including the Wentworths and Beaumonts.
- The modern use of the estate for educational use has resulted in the loss of some original parkland around Bretton Hall itself. The use of the parkland by the YSP contributes a new chapter to the special interest of the estate and is complementary and sympathetic to the overall character of the parkland.
- Overall, setting makes a relatively minor contribution to the significance of the RPG. The principal designed views and vistas within the site are created by connecting features and elements of the landscape which are within the designated boundary and these internal views are an important aspect of the composition. Views of the surrounding landscape from the RPG are generally experienced as an incidental backdrop to the park itself, emphasising the rural nature of the landscape in which the park is positioned. Some resonance exists between the agricultural use of parts of the RPG and the surrounding landscape, and there is likely to be an historical and functional relationship to the surrounding area. The proposed allocation site forms part of the wider physical surroundings of the RPG and comprises agricultural land divided by field boundaries. It makes a minimal contribution to significance as a small part of an expansive area of setting and is distanced from the asset.

5. Assessment of Views

Viewpoints

- 5.1 The Landscape Statement (April 2017) provides a series of landscape viewpoints which identify the potential visibility of development at the proposed allocation site from across the RPG. These are accompanied by ZTV diagrams which identify the potential for changing visibility over time as a result of the mitigation through landscaping.
- 5.2 It has been identified that the proposed allocation site will be visible from the following viewpoints:
 - Viewpoint 01 Bridleway at northern end of historic park and garden (2.14km from the proposed allocation site).
 - Viewpoint 02 Dearne Way (2.25km from the proposed allocation site).
 - Viewpoint 02D Dearne Way (1.28km from the proposed allocation site).
 - Viewpoint 04 Oxley Bank (1.91km from the proposed allocation site).
 - Viewpoint 05 Yorkshire Sculpture Park Visitor Centre (2.3km from the proposed allocation site).

Assessment

5.3 The below assessment considers the contribution of each of the above views to the overall significance of the RPG. It also considers the potential impact of change on the view as a result of the proposed allocation.

Viewpoint 01 – Bridleway at northern end of historic park and garden

- 5.4 This viewpoint is located in the northern part of the designated area in the open grazing land known as 'Middle Park' and on a bridleway route which is lined by an avenue of trees visible on historic mapping. This represents a high point in the northern part of the estate and expansive views are available to the east and south over the surrounding landscape. The view encompasses a mixed undulating landscape comprising fields divided by hedgerows interspersed with wooded areas and visible built settlements including Clayton West.
- 5.5 This represents one of the limited positions within the RPG where the view encompasses a wide vista of open landscape outside the designated area. The view contributes towards overall significance by emphasising the rural nature of the landscape surrounding the RPG and the functional connection between the agricultural uses both inside and outside the park. Additionally it provides a rural backdrop against which the parkland is visually experienced.
- 5.6 The potential development of the proposed allocation will be visible from this location. The ZTVs identify that the ground level is largely visible and that 9m buildings will be

- visible. When combined with 13m mitigation the large majority of the buildings will be screened but some areas of the site will remain visible from the RPG.
- 5.7 Development at the proposed allocation site will bring built form closer to the designated area, however this will be experienced in the context of existing built form which is already visible. The addition of landscaping will largely screen the buildings and would be experienced as part of the existing context which includes wooded areas.
- 5.8 The visibility of potential buildings at the proposed allocation site will not affect the contribution made by Viewpoint 1 to the overall significance of the RPG. The view will continue to be largely agricultural in character and there will be limited change to the appreciation of the rural character of the surrounding landscape or the dialogue between the agricultural use of the land in this part of the park and the surrounding setting.

Viewpoint 02 – Dearne Way

- 5.9 Viewpoint 02 is located on the Dearne Way, a bridleway which skirts the west side of Bretton Hall and the YSP boundary. The viewpoint locations A-C are presented as a kinetic experience looking west towards the proposed allocation site whilst travelling south along the Dearne Way.
- 5.10 At this point the Dearne Way is travelling down the slope of the valley away from the high point to the north around Viewpoint 01 towards the lakes in the valley bottom. Views to the east are contained by wooded areas which restrict and filter views into the YSP and towards Bretton Hall. Open views across the landscape to the west are available from the highest points, around A and B, and these views encompass a broad open rural landscape which is interspersed with wooded areas and visible areas of built form around Clayton West. Views from the southern end of Viewpoint 02 (view C) are more limited as the topography of the landscape lowers towards the valley bottom and views are truncated by topography and areas of trees.
- 5.11 Similarly to Viewpoint 01, Viewpoint 02 A and B represent some of the few positions within the designated RPG where views encompass a wide backdrop of open landscape outside the designed area. The view contributes towards the overall significance of the RPG by emphasising the rural quality of the landscape surrounding the parkland and the functional connection between the agricultural uses both inside and outside the park. Additionally it provides a picturesque rural backdrop against which the parkland is experienced.
- 5.12 Whilst the Middle Park area forms part of the RPG and makes a contribution to significance in illustrating the variety of land types and uses in the designed area, and resonates with the wider agricultural land in the setting, this area of the RPG is visually separated from the principal features of the designed area including the lakes and the principal buildings by topography and wooded areas. Overall, the contribution of this area and the views from within it are relatively limited.
- 5.13 The potential development at the proposed allocation will be visible from this location. The ZTVs in the Landscape Statement show that ground level is partially visible and that 9m buildings will be visible. When combined with 13m mitigation the large

- majority of the buildings will be screened but some areas of the site will remain visible from the RPG.
- 5.14 The development of the proposed allocation site will result in buildings being closer to the designated area and more prominent in this view; however this will be experienced in the context of the existing built area of Clayton West. The addition of landscaping will ensure that over time the buildings would be largely screened and this would be experienced as part of the existing landscape which includes wooded areas.
- 5.15 The visibility of potential buildings at the proposed allocation site will not affect the contribution which Viewpoint 2 makes to the overall significance of the RPG. The view will remain principally agricultural in character and there will be no change to the existing resonance between the agricultural use of this part of the RPG and the wider setting.

Viewpoint 02D Dearne Way

- 5.16 Viewpoint 02D is located on the Dearne Way after it has turned sharply west away from the YSP boundary and from Viewpoints A-C. The viewpoint is located at the top of a steep drop as the path slopes down towards Bentley Brook, and from this point views are available towards the proposed allocation site when looking south east.
- 5.17 The viewpoint is located towards the extreme west side of the RPG and the area is principally agricultural in character. Due to topography and intervening wooded areas there is little legibility of the designated character of the parkland or of any of the principal features. Nonetheless the area, as above, contributes through forming part of the wide variety of landscape types within the RPG and through its resonance with the wider agricultural landscape. The view contributes towards the overall significance of the RPG by emphasising the rural quality of the landscape surrounding the parkland and the functional connection between the agricultural uses both inside and outside the park.
- 5.18 The proposed allocation site is located approximately 1.2 km from this viewpoint and will be visible. The ZTVs in the Landscape Statement show that ground level of the allocation site is largely visible and that 9m buildings will be almost entirely visible. When combined with 13m mitigation the large majority of the buildings will be screened but some areas to the north of the site will remain visible.
- 5.19 The development of the proposed allocation site will result in built development being closer to the viewpoint and prominent in views. This prominence will be decreased over time due to the development of landscaping. Any visible built form would however be experienced as part of the existing context of built form in the view and the overall rural character of the view will not be altered.
- 5.20 The potential visibility of buildings at the proposed allocation site will not affect the contribution which Viewpoint 02D makes to the overall significance of the RPG. The view will remain principally agricultural in character and there will be no change to the existing resonance between the agricultural use of this part of the RPG and the wider setting.

Viewpoint 04 - Oxley Bank

- 5.21 Oxley Bank is a raised ridge which forms the east boundary of the southern part of the RPG. Viewpoint 04 is located to the south east side of the RPG boundary and vistas towards the east from this position encompass a broad swathe of open landscape. In the foreground is the southern part of the RPG, known as Long Side, and beyond this area is open undulating agricultural landscape which, as aforementioned, is broadly agricultural and divided by field boundaries and wooded areas. The built area of Clayton West is visible.
- 5.22 Due to intervening distance and topography there is little legibility of the designated central area of the RPG from viewpoint 04, and along Oxley Bank, however an important view of the south frontage of Bretton Hall is available.
- 5.23 The view makes a contribution to the overall significance of the RPG by illustrating the expansive rural landscape in which it is situated, and by the resonance between the agricultural uses inside the boundary with those in the setting.
- 5.24 The ZTVs in the Landscape Statement show that ground level of the proposed allocation site is not visible from this viewpoint. 9m buildings would be largely not visible with the exception of a small part of the west side of the site, and when mitigation is considered the visibility would remain similar.
- 5.25 The development of the proposed allocation site will result in a very limited increase in built form visible from this viewpoint and like the other identified viewpoints; this will be visible from some distance away. The overall rural context and character of the view will not be compromised.

Viewpoint 05 - Yorkshire Sculpture Park Visitor Centre

- 5.26 Viewpoint 05 is taken from within the YSP visitor centre and gallery complex which is located to the central area of the designated area to the north east of Bretton Hall, on the path which connects the modern visitor centre with the Bothy Gallery. This area of the park is relatively formal and includes buildings associated with the former house and gardens and terracing, as well as some walled garden areas, most of which are now incorporated into the YSP with galleries and artworks.
- 5.27 Much of the YSP visitor centre and surrounding area are enclosed by trees and due to topography there are few areas where long distance views are available into the surrounding landscape. This viewpoint is therefore unusual in its immediate area and forms part of the varying experiences available when travelling through the designated area.
- 5.28 The view looks south-west and largely encompasses a broad landscape including agricultural fields, with the raised area of High Hoyland to the west side of the view. A belt of mature trees is located close to the viewpoint and this restricts views of the middle distance; beyond there are glimpses of built development amongst a largely rural landscape.
- 5.29 The view contributes towards the overall significance of the RPG by emphasising the rural quality of the landscape surrounding the parkland. Additionally it provides a

- picturesque rural backdrop against which the parkland is experienced, and contributes to the variety of experiences within the park.
- 5.30 The ZTVs indicate that the proposed allocation site is visible in this view, and that 9m buildings would also be visible. With the addition of on-site mitigation comprising 13 m landscaping much of the development would not be visible however some glimpses of built form would remain.
- 5.31 Development at the proposed allocation site will therefore bring built form closer to the designated area; however this is still approximately 2.3km from the viewpoint location and will be experienced in the context of existing visible built form. The addition of landscaping will largely disperse views of the buildings and the trees would be experienced as part of the existing landscape which includes wooded areas.

Summary

5.32 The development of the proposed allocation site is likely to result in some increased visibly of built form from the relevant viewpoints. This will not however affect the contribution which these views make to the overall significance of the RPG; the change in character of the views will be minimal. The views will remain largely agricultural in context; built form will be experienced in the context of existing visible built form. The development will result in a limited change within the setting of the RPG. This will not undermine the experience or appreciation of the asset nor harm its significance.

6. Summary and Recommendations

Summary

- This Heritage Appraisal (the 'Appraisal') has been prepared by Turley Heritage on behalf of Clayton West Development Company Limited ("CWDCL"). The purpose of the Appraisal is to provide an assessment of the significance and setting of Bretton Hall Registered Park and Garden (the 'RPG') to inform the Examination in Public (EiP) process in relation to the proposed allocation of the Clayton West employment site. This is comprised of the CWDCL land and the E2333a land and is referred to in this report as the 'proposed allocation site'.
- 6.2 Following the identification of the Clayton West site for employment use, discussions have been undertaken between Kirklees Council, HE and QUOD to consider any potential impacts of development at the proposed allocation site on designated heritage assets, in particular Bretton Hall RPG and associated assets. A 'Landscape Statement' document was prepared by Smeedon Foreman and this identified a series of viewpoints from the RPG towards the proposed allocation site.
- 6.3 Following discussions with HE it was agreed that new ZTV maps would be prepared from five identified viewpoints to further understand the visual impact of specific building heights and landscaping. HE identified that further work was required to establish the level of harm that the development might cause to the RPG. Therefore this Appraisal has considered the significance and setting of Bretton Hall RPG and provided an assessment of the potential impact of development of the proposed allocation site upon that significance, with reference to the viewpoints prepared by Smeedon Foreman.
- 6.4 The Bretton Park RPG is designated at Grade II. Within its boundaries are a number of additional listed buildings, but these have been excluded from the assessment following discussions with HE.
- 6.5 The Bretton Hall RPG is of substantial interest as an 18th and 19th century designed parkland. Whilst the present landscape is borne of continual change and remodelling by different generations of owners and designers the principal features remain and are legible. The composition of key features, including lakes, wooded areas, principal buildings and garden buildings and features, is ascribed substantial interest. Designed views and vistas within the parkland make a substantial contribution to significance, emphasising the quality of the composition and contributing towards a variety of experiences within the parkland, though later change has reduced the overall authenticity of these experiences. Important associations exist with the families who owned the estate including the Wentworths and with the garden designers Woods and Robert Marnock.
- 6.6 The setting of the RPG is considered to make a relatively minor contribution to its significance. The principal designed views and vistas within the site are created by connecting features and elements of the landscape which are **within** the designed boundary and these internal views are an important aspect of the composition. Views

- of the surrounding landscape are generally experienced as an incidental backdrop to the park itself, emphasising the rural nature of the landscape in which the park is positioned.
- 6.7 Some resonance exists between the agricultural use of parts of the RPG and the surrounding landscape, and there is likely to be a historical and functional relationship to parts of the surrounding area. The proposed allocation site forms part of the wider physical surroundings of the RPG and comprises agricultural land divided by field boundaries. It makes a minimal contribution to significance as a small part of a distant and expansive setting.
- 6.8 The proposed allocation site is visible from five viewpoints within the RPG. Chapter 5 of this report assesses the contribution these viewpoints make to the RPG and the potential impact of development of the proposed allocation site on these views. These views are distant and generally comprised of a backdrop of undulating rural landscape separated into agricultural fields and interspersed by wooded areas. Also visible in these views are a number of built settlements including Clayton West. Development at the proposed allocation site is likely to result in a limited change to these views with buildings being partially visible closer to the RPG. The buildings will however be experienced in the context of existing built form already visible in these views and over time proposed landscaping will reduce this visibility. Whilst this will result in change within this part of the setting of the RPG, it will not undermine the experience or appreciation of the asset nor harm its significance.

Heritage Recommendations

- 6.9 In the event the allocation is confirmed, and for the reasons outlined above there are no heritage reasons to suggest otherwise, we would recommend that consideration is given to the following:
 - The use of landscaping, as illustrated by the ZTVs;
 - Consideration to the choice of colour of the proposed buildings, with natural colours being preferable to reduce visual effects. We would recommend a nonreflective cladding and roof structure to reduce glare.

Appendix 1: Historic Maps

Figure 1.1 1849-51 Map

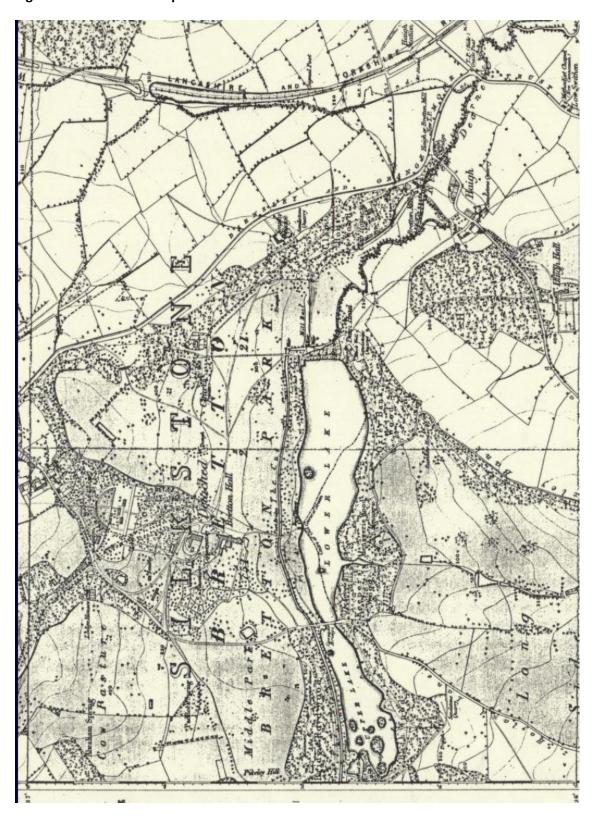


Figure 1.2 1891 (north side)

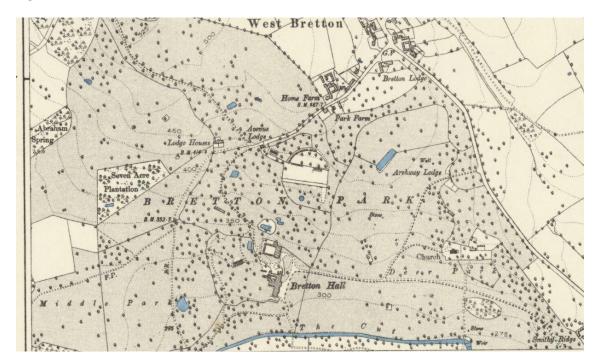


Figure 1.3 1891 (south side)

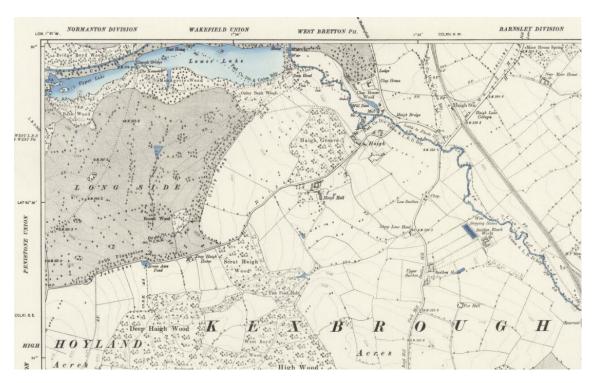


Figure 1.4 1904 north side



Figure 1.5 1904 south side

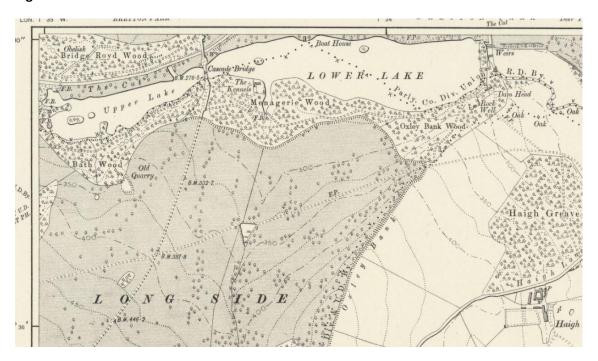


Figure 1.6 1930 (north side)



Figure 1.7 1930 (north side)

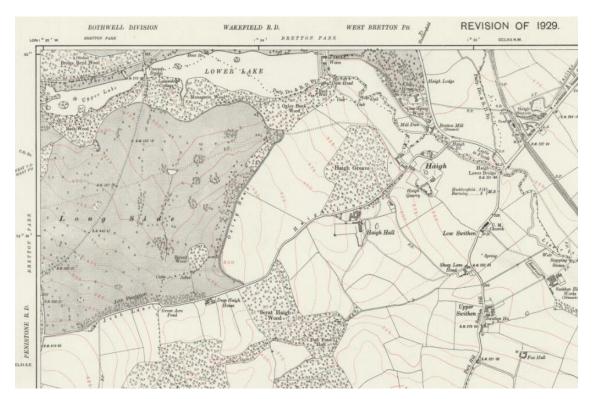


Figure 1.8 1948 north side

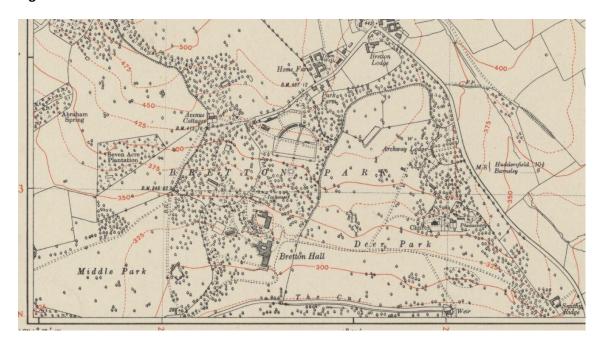
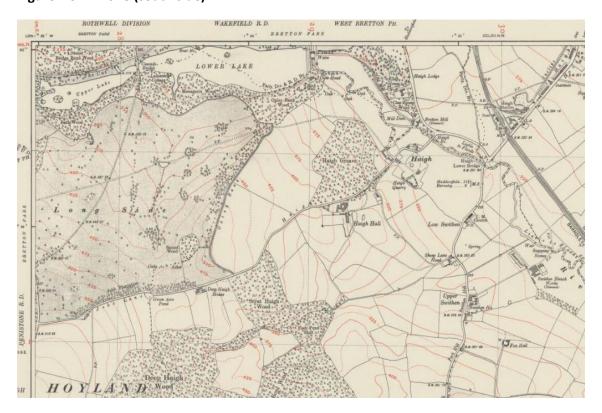


Figure 1.9 1948 (south side)



Appendix 2: Listed Buildings within RPG Boundary

Name	Grade	Date of Designation
Bretton Hall Including Attached Orangery to West	*	14 February 1952
Church in Bretton Park	II*	22 November 1966 (amended 21 June 1990)
Milepost approximately 600 Metres South of Junction with Park Road	II	6 May 1988
Bretton Lodge	II	22 November 1966
Churchyard Wall with Gateways and Gates to West, South and East of Church in Bretton Park	II	22 November 1966 (amended 6 May 1988)
Bridge over the Cut (East End) in Bretton Park	II	6 May 1988 (amended 21 June 1990)
Grotto at Bretton Hall	II	9 March 1998
OVERFLOW TO LOWER LAKE, 3 WEIRS TO EAST SIDE OF DAM AND PUMP HOUSE ADJACENT TO MIDDLE WEIR IN BRETTON PARK	II	6 May 1988
STABLE RANGE IN BRETTON PARK APPROXIMATELY 50 METRES NORTH OF BRETTON HALL	II*	22 November 1966 (amended 21 June 1990)
GARDENERS COTTAGE INCLUDING ATTACHED GARDEN WALLS, SHEDS AND CART SHEDS	II	6 May 1988 (amended 21 June 1990)
THE PHEASANTRIES IN BRETTON PARK	II	22 November 1966 (amended 21 June 1990)
BRIDGE OVER THE CUT IMMEDIATELY NORTH OF CASCADE BRIDGE IN BRETTON PARK	II	6 May 1988 (amended 21 June 1990)
ROCK WELL APPROXIMATELY 50 METRES WEST OF DAM HEAD COTTAGES IN BRETTON PARK	II	23 November 1987
FOOTBRIDGE IN MENAGERIE WOOD APPROXIMATELY 200 METRES SOUTH EAST	II	23 November 1987

OF CASCADE BRIDGE IN BRETTON PARK		
TERRACE IN BRETTON PARK APPROXIMATELY 300 METRES NORTH OF BRETTON HALL	II	6 May 1988 (amended 21 June 1990)
HAIGH LODGE IN BRETTON PARK (SOUTH EAST END)	II	22 November 1966
THE NORTH LODGE AT BRETTON PARK	II	22 November 1966
WELL HEAD IN BRETTON PARK	II	9 March 1998
SUMMER HOUSE IN BRIDGE ROYD WOOD APPROXIMATELY 200 METRES WEST OF CASCADE BRIDGE IN BRETON PARK	II	6 May 1988 (amended 21 June 1990)
CAMELLIA HOUSE IN BRETTON PARK APPROXIMATELY 80 METRES WEST OF BRETTON HALL	II	22 November 1966 (amended 21 June 1990)
ARCHWAY LODGE IN BRETTON PARK INCLUDING FLANKING WALLS	*	22 November 1966 (amended 21 June 1990)
CASCADE BRIDGE AND WEIR IN BRETTON PARK	II	6 May 1988 (amended 21 June 1990)
TERRACE AND ATTACHED HA HA WALL IMMEDIATELY SOUTH OF BRETTON HALL	II	6 May 1988 (amended 21 June 1990)
SCULPTURE, VIRGINIUS AND HIS DAUGHTER, AT EAST END OF TERRACE IN BRETTON PARK, APPROXIMATELY 300 METRES NORTH OF BRETTON HALL	II	6 May 1988 (amended 21 June 1990)

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