

Matter 27 – Strategic employment allocations: Green Belt releases

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

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

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

Manufacturing would be supported on the site with particular focus being afforded to precision engineering and advanced manufacturing in accordance with Kirklees Council's Employment Strategy.

The indicative capacity of 41,020 sq m can be accommodated on the site, as shown on previously submitted indicative masterplan (SS11). They show how the internal access roads can be accommodated, as well as a buffer zone to the west and south of the site. The south is large enough to accommodate large units and the necessary car parking areas. The site can be developed in phases, with the first phase being to the north of the site, with access off Whitehall Road. The first phase will generate the funds required to install the necessary infrastructure and build out the remainder of the site.

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

Kirklees Council and the wider Leeds City Region (LCR) Local Enterprise Partnership are committed to boosting the manufacturing sector with particular focus being afforded to the precision engineering and advanced manufacturing sectors. This accords with the Leeds City Region Skills Plan, with its vision to “*build a knowledge-rich, creative economy fired by resurgent manufacturing, technical and engineering expertise.*”

Large flat sites, with good access to the motorway junctions and proximity to a skilled workforce will be required to deliver on these objectives.

The Council's Employment Technical Paper (SD22) sets out that evidence from various sources is consistent and points towards a lack of supply of sites that are of sufficient size. It also points out that “*it is important to understand the locational needs of businesses that would be willing to occupy these larger sites. Evidence of the employer's survey suggests key location criteria include:*

- *Proximity to the major road network (including motorway junctions),*
- *Avoidance of congestion;*
- *Further land/expansion opportunities;*
- *Access to the workforce;*
- *Parking Provision; and*
- *An Attractive environment.”*

The same technical paper sets out that work undertaken by Bilfinger GVA in 2015 found that the *“Proximity to the M62 / key motorway junctions presents the greatest opportunity to attract strategic demand and therefore national and regional occupiers. Proximity to the M62 is often stated as the number one requirement of an occupier (5 miles / 5 minutes distance is seen as the limit for some occupiers)”*

They continue to state that *“Development activity is increasing but developers, occupiers and investors have become more selective. There continues to be a strong preference for quality sites in good locations benefiting from good connectivity, particularly to the strategic road network.”* (LE11, Kirklees Employment Market Strength Assessment, Bilfinger GVA, 2015).

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

The site promoters recognised the need for additional employment land of large scale in Kirklees, in close proximity to the motorway and an established workforce. This site meets each of the criteria and was therefore promoted through the Local Plan Call for Sites exercise to ensure the site was considered for employment purposes.

The site is bounded by physical barriers off Whitehall Road to the north, Whitechapel Road to the south and the M62 motorway to the east. To the north east the site is bordered by the Spen Valley Greenway. The site is within two separate ownerships who are working in collaboration to bring the site forward for development. To the west the site is bounded by a cemetery and a Wholesale Nursery & Garden Centre which further constrains the site. These sites are in separate ownerships.

The site's ownerships coincides neatly with the physical constraints that define the extent of the boundary, to create a large development site, in a sustainable location that meet the criterion defined by the employers survey set out above.

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

There are no heritage assets in the vicinity of the site.

An archaeological evaluation has been undertaken for the site which concludes that the site has been used for agricultural purposes and remains undeveloped to this present day. The archaeological desk-based assessment has established that there is low potential for archaeological remains within the proposed site allocation. English Heritage and WYAAS have raised no objections.

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

A high pressure gas main runs down the western side of the site and then along the south western corner of the site. The presence of the high pressure gas main has been

taken into consideration whilst determining the developable area of the site. The non-developable area lends itself to the provision of a buffer zone, to enable clear separation between the proposed employment development and the residential area to the south west, and the cemetery and the Wholesale Nursery & Garden Centre to the west.

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

Access can be achieved directly from the A58 Whitehall Road and Whitechapel Road. These could be linked internally or could be separate culs-de-sac. Visibility splays of 4.5m x 215m can be provided in each direction. The junction on to Whitechapel Road is likely to be a simple priority arrangement given the low network flows along this route.

Highways England have confirmed that the development of the site does not have the potential to generate a significant impact upon the Strategic Road Network (including Junction 26 of the M62 - Chain Bar).

A Drainage and Flood Risk Assessment has been carried out for the site. It concludes that the area of the site to be developed currently falls within Flood Zone 1 as defined by the EA Flood maps. No part of the site to be developed is at risk of flooding from river or tidal water up to a 1% return period. The flood risk is considered to be acceptable for commercial light industrial development. The risk of overland flows entering the site is considered to be very low due to the topography of the area around the site and the drainage systems to the previously developed areas to the west. The risk can be further minimised by providing a flood water route through the site to ensure flood water flows are directed away from the existing and proposed buildings.

A valued feature of the area is the Spen Valley Heritage Trail, which currently runs through the existing site. Due to this trail being a key feature it can be incorporated into the masterplan design, to improve the existing landscape through water features and ponds; tree planting, an attractive and inclusive building layout. The tranquillity of the site can be improved through the use of planting additional trees along the boundary. This would reduce traffic noise from the M62 as well as making the site more visually appealing for walkers and potential workers on the site. This would also help to maintain the rural feel for the residents located south of the site and help mitigate against any noise produced on the site.

- 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?

It has been established that the objectively assessed need (OAN) for jobs in Kirklees is approximately 23,200 full time equivalent over the plan period, which equates to 175 hectares of land. As set out in the Council's Employment Technical Paper (SD22), and their Employment Land Supply Briefing Note (EX36) the urban supply of land is insufficient in both quantum and market appeal in terms of location, scale etc. to meet the objectively assessed. The Briefing Note (EX36) concludes that if the Local Plan is to meet the needs of the Kirklees Economy in full, 114 hectares of green belt land is

required to deliver both the Kirklees Economic Strategy and the Leeds City Region Economic Plan. We believe these are exceptional circumstances that justify altering the Green Belt.

The District has not seen a new supply of employment land for nearly 17 years. An assessment of alternative sites clearly show that the proposed site at Whitehall Road, along with other identified strategic sites in the Green Belt are the only sites within Kirklees that meet the real needs of employers i.e. The evidence from the employer's survey that suggests key location criteria include:

- *Proximity to the major road network (including motorway junctions),*
- *Avoidance of congestion;*
- *Further land/expansion opportunities;*
- *Access to the workforce;*
- *Parking Provision; and*
- *An Attractive environment.*

In terms of the impact on the Green Belt and the purposes of including land within it, the Council's Green Belt Review (April 2017) sets out in 2.18 that "The only opportunity for westward expansion of Cleckheaton would be to 'jump' the motorway, although separation from Scholes would need to be retained in order for the green belt to continue to fulfil its strategic role. The specific assessment of changes to the Green Belt Boundary in the area identified air quality issues from the M62 as being the only moderate constraint for the site.

In terms on how the land impacts on the function of the Green Belt as set out in the National Planning Policy Framework, the changing of the Green Belt boundary in this location would:-

- Not check the unrestricted sprawl of large built-up areas (as a new boundary would be established that would continue to fulfil this function)
- Would continue to prevent neighbouring towns merging into one another (the gap between Scholes and Cleckheaton would close, but there would still be a clear area of separation between the two areas).
- Would continue to assist in safeguarding the countryside from encroachment. (The primary function of the green belt in this location is to prevent neighbouring towns from merging, rather than encroachment into the countryside)
- Would not impact on the preservation of the setting and special character of historic towns; and
- The specific requirements of employers which makes this site attractive, would mean employers and developers would not consider derelict and other urban land to be appropriate for their need, as there are no derelict or urban sites that meet the following criterion:-
 - *Proximity to the major road network (including motorway junctions),*
 - *Avoidance of congestion;*
 - *Further land/expansion opportunities;*
 - *Access to the workforce;*
 - *Parking Provision; and*
 - *An Attractive environment."*

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?

The proposal is viable and deliverable. There has already been a significant amount of interest in the site from developers. The site has very similar traits to sites brought forward last year (2017) which include:

- Eurohub Wakefield – 189,000 sq ft (Grade B)
- Oakwell 27, Birstall – 110,000 sq ft (Grade B)
- Coal Road, Leeds – 95,000 sq ft (Design & Build)
- Markham Vale, Chesterfield – 90,500 sq ft (Design & Build)
- Transpennine 62, Elland – 126,000 sq ft (Grade B)
- Logic Leeds – 362,000 sq ft (Design & Build) Agreement for lease signed.

The lack of supply of units has led to some speculative development in the region, albeit this is still minimal and supply of good quality stock is limited across all size ranges. There is however a growing appetite from developers to speculatively build units supported by successful schemes such as Logic Leeds 30,000 sq ft to 600,000 sq ft), commencing with an 80,000 sq ft speculatively built unit followed by a further three 30-40,000 sq ft units. New Hall Business Park, Bradford has set the level for small speculatively built trade-counter led schemes providing units from 2,500 to 12,000 sq ft, achieving near full occupancy within 12 months of completion.

As Highways England conclude that the impact of the proposed development on the strategic highway network is deemed less than significant, phasing for the site will not be required.

**Land at Whitechapel Road,
Cleckheaton, BD19 6HQ, West Yorkshire**

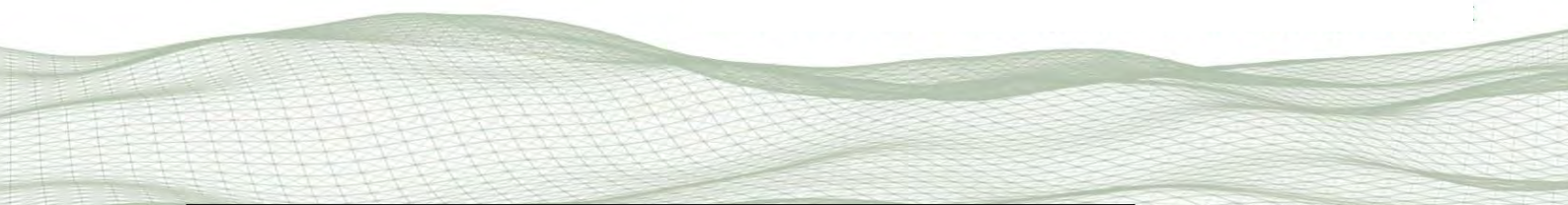
**Landscape Visual Appraisal &
Landscape Strategy**

T0030

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DOCUMENT INFORMATION AND CONTROL SHEET

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Any questions or matters arising from this Report should be addressed in the first instance to the Project Manager.

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Introduction

Topia Landscape Architects were commissioned by Martin Walsh Architectural in January 2018 to complete a Landscape Visual Amenity appraisal and develop a Landscape Strategy for land north of Whitechapel Road, Cleckheaton. The land is shown within the Draft Local Plan, 2016 published by Kirklees County Council as a potential employment zone. The site, 24ha in area is located on existing farmland south west of the M62 Junction 26, at grid reference no 417607E, 4263201N. The land falls within the Green Belt of Kirklees Metropolitan Borough Council.

Pre-Application Consultation

Several consultation meetings have been held in December 2017 and January 2018 between Martin Walsh Architectural and Kirklees Council Planning Officers. One of the outcomes of the meeting in December was a request by the Officers for an assessment of the local landscape character and preparation of a Landscape Strategy document which this report seeks to address.

Scope of the report

Desk top research and fieldwork were completed of the site and the surrounding area in January 2018 to assess the local character and potential effects that would be incurred in relation to the landscape and visual amenity. This report describes the potential landscape and visual effects of the alteration from farmland to industrial employment use and then further develops a Landscape Strategy for the site with proposals for mitigation measures

The appraisal assessed the potential effects of change in land use within a 2km study area. The allocation of farmland to industry is considered to be permanent and non-reversible throughout this report. The report is arranged as follows:

- Methodology;
- Planning policy, landscape character context and landscape designations;
- Site description and proposed development;
- Landscape Strategy, this section outlines a green infrastructure approach for the site, identifying potential mitigation to be incorporated into the masterplan. Potential construction and operational effects are considered;
- Landscape effects; this section covers a baseline description of the natural features within the site and the surrounding local landscape character, including an assessment of sensitivity and description of potential residual effects (following mitigation).
- Visual effects; this section identifies the zone of potential visibility and within it identifies potential receptors which may be affected in relation to visual amenity. Also identifies the potential residual effects, (following mitigation). Construction and operational effects are considered;
- Conclusions;
- Appendices with supporting illustrative material.

The terminology used within the appraisal is as follows:

- *The site* – refers to the extents or site area located within the red line boundary;
- *The proposed development* – refers to features or components of the proposal likely to contribute to landscape and visual impacts. The report assumes the development would be typical of the style of industrial development, large light coloured rectangular built form with ancillary highway and landscape infrastructure.

Study Area

A Zone of Visual Influence plan (ZVI) was prepared with the assumption that the proposed buildings would be 12m above existing ground levels at its highest point, *taken as a worst case scenario*. The ZVI, with accompanying fieldwork identified a study area of 2km from the centre of the site. For the proposed development it was considered the primary landscape and visual effects would be confined to within this extent.

Methodology

The methodology presented is based on the following best practice guidance:

- Guidelines for Landscape and Visual amenity assessment Impact Assessment, Third Edition 2013, as published by the Institute of Environmental Assessment and Landscape Institute.
- LI Advice Note 01/2011, Photography and photomontage in landscape and visual Impact Assessment, Landscape Institute.

In addition, reference will be made to published guidance drawn on the following relevant baseline information:

- Kirklees District Landscape Character Assessment, Land Use Consultants, July 2015;
- Kirklees Council Landscape Architects, Land south of Whitehall Road, Cleckheaton, Landscape Character Assessment, Site ID E1831, September 2015;
- Ordnance Survey maps;
- Field surveys and
- Aerial photography using the website, Google Earth.

The aim of the landscape visual appraisal is to identify, predict and evaluate potential key effects arising from the change in land use. Wherever possible identified effects are quantified, but the nature of landscape and visual appraisal requires interpretation of professional judgement. In order to provide a level of consistency to the appraisal, the prediction of magnitude and appraisal of the residual landscape and visual effects have been based on pre-defined criteria. The Guidelines for Landscape and Visual Appraisal (3rd Edition), GVL A states that, '*Professional judgement is a very important part of the LVIA. In all cases there is a need for the judgements that are made to be reasonable and based on clear and transparent methods so that the reasoning applied at different stages can be traced and examined by others.*'

Further detail on methodology is described in Appendix A.

Planning Policy

The following section relates to the local planning policies which are related to landscape and are considered to be relevant to the proposed development and the surrounding areas:

- National Planning Policy Framework (2012);
- Kirklees Unitary Development Plan Saved Policies (2007);
- Kirklees Draft Local Plan (2016).

National Planning Policy Framework, 2012

In relation to National Planning Policy Framework, there would be no national landscape designations affected by the development. The following planning policies list out the requirements for proposed development in relation to landscape and biodiversity:

Paragraph 17 of the National Planning Policy Framework sets out twelve core land-use planning principles that should underpin decision-taking, including a presumption in favour of sustainable development, taking account of:

- *‘always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings;*
- *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.’*

Paragraph 56 states that “good design is a key aspect of sustainable development”;

Paragraph 58 describes how planning decisions should aim to ensure that developments “function well and add to the overall quality of the area...establish a strong sense of place...respond to character and history and reflect the identity of local surroundings and materials...are visually attractive as a result of good architecture and appropriate landscaping”.

Paragraph 64 states that ‘permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.’

Paragraph 109 refers to “protecting and enhancing valued landscapes...”

Paragraph 118 describes, ‘aim to conserve and enhance biodiversity...opportunities to incorporate biodiversity in and around developments should be encouraged.’

Kirklees Unitary Development Plan Saved Policies (2007)

The site falls within Kirklees District and as such the relevant Development Plan comprises the policies which were adopted in March 1999. As a result of a Direction issued by the Secretary of State for Communities and Local Government, from 28 September 2007 some of the policies in the UDP continue to have effect (‘saved policies’). Those policies not covered by the Direction are not “saved” and no longer form part of the development plan. The following table sets out the relevant key policies:

Policy Ref	Planning Policy
Policy G1	<p><i>Regeneration will be secured through developments which:</i></p> <ul style="list-style-type: none"> <i>i. Strengthen and broaden the economic base and increase employment opportunities</i> <i>ii. Improve infrastructure and secure the reuse of land and buildings and the improvement of their surroundings</i> <i>iii. Benefit the economically deprived parts of the district, and</i> <i>iv. Improve the district’s image</i>
Policy G4	<p><i>New development should achieve a high standard of design</i></p>
Policy G5	<p><i>Development proposals should have regard to equality of opportunity in terms of access to buildings and open space facilities and other relevant aspects of design, including the provision of ancillary facilities</i></p>

Policy Ref	Planning Policy
Policy BE1	<p><i>All development should be of good quality design such that it contributes to a built environment which:</i></p> <ul style="list-style-type: none"> <i>i. Create or retains a sense of local identity</i> <i>ii. Is visually attractive</i> <i>iii. Promotes safety, including crime prevention and reduction of hazards to highway users;</i> <i>iv. Promotes a healthy environment, including space and landscaping about buildings and avoidance of exposure to excessive noise or pollution;</i> <i>v. Is energy efficient in term of building design and orientation and conducive to energy efficient modes of travel, in particular walking, cycling and use of public transport</i>
Policy BE2	<p><i>New development should be designed so that:</i></p> <ul style="list-style-type: none"> <i>i. It is in keeping with any surrounding development in respect of design, materials, scale, density, layout, building height or mass;</i> <i>ii. The topography of the site (particularly changes in level) is taken into account;</i> <i>iii. Satisfactory access to existing highways can be achieved; and</i> <p><i>Existing and proposed landscape features (including trees) are incorporated as an integral part of the proposal.</i></p>
Policy DL1	<p><i>Derelict and neglected land will be brought into beneficial use to assist in the regeneration of the district.</i></p>

Kirklees Draft Local Plan Submission Documents SD1, (2016)

In April 2017, Kirklees Council submitted the draft Local Plan to the Secretary of State. This Plan consists of two main documents: Strategy and Policies; Allocations and Designations. The employment area part of the site is proposed to be allocated for employment purposes. Independent planning inspectors are currently examining the Local Plan with further Stage 4 Examination Hearings to be held in spring 2018. At the present time, the policies within the draft Local Plan have limited weight. The following table lists the relevant policies:

Policy Ref	Policy Description
PLP 32 Landscape	<p><i>Proposals should be designed to take into account and seek to enhance the landscape character of the area considering in particular:</i></p> <ul style="list-style-type: none"> <i>a the setting of settlements and buildings within the landscape,</i> <i>b the patterns of woodland, trees and field boundaries;</i> <i>c the appearance of rivers, canals, reservoirs and other water feature patterns within the landscape.'</i>
PLP33 Trees	<p><i>'planning permission will not be granted for schemes which directly or indirectly threaten trees or woodland of significant amenity. In addition, proposals are expected to retain important or valuable trees where they contribute to public amenity or the local character and distinctiveness, including the Wildlife Habitat Network and green infrastructure networks. Where tree loss is considered acceptable mitigation measures will be required.'</i></p>

Policy Ref	Policy Description
PLP34 Conserving and enhancing the water environment	<p><i>'proposals will be supported which do not result in deterioration of water courses or water bodies (including groundwater) and conserve and enhance:</i></p> <p><i>a the natural geomorphology of watercourses, including reinstating watercourses to their natural state through removal of modifications resulting from past industrial uses;</i></p> <p><i>b water quality;</i></p> <p><i>c the ecological value of the water environment, including the functionality of habitat networks.</i></p>

Landscape Designations

The land falls outside any national, regional or local landscape designations.

Refer to Drg Ref No T0030.003 which illustrates the environmental planning designations within the 2km study area surrounding the site. To the south west lies the Scholes Conservation Area containing a number of Listed Buildings. To the north west of the site are a number of isolated farmsteads some of which are Listed. Within the nearby settlements of Low Moor, Wyke, Cleckheaton and Hartshead lie a number of Listed Buildings also surrounded by built form.

The existing trees within the Whitechapel Road Cemetery are covered by Tree Preservation Order. Trees on the eastern perimeter of the cemetery overhang the site boundary into the south west part of the site.

Landscape Character

Within the Appendix D, Drawing Ref No T0030.005 illustrates the Landscape Character Areas within the 2km study area, extracted from the regional documents, Kirklees District Landscape Character Assessment and the South Bradford Landscape Character Supplementary Document.

National Character Area 37: Yorkshire Southern Pennine Fringe

The key characteristics of this NCA relevant to the proposed development are as follows:

- *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.*
- *Several major rivers flow through the rural and urban areas of the NCA, generally from west to east in broad valleys.*
- *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.*
- *Many areas affected by urban fringe pressures creating fragmented landscapes, some with a dilapidated character, separated by substantial stretches of intact agricultural land in both arable and pastoral use.*
- *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.*

Kirklees District Landscape Character Assessment, Land Use Consultants, July 2015

The site falls within the Landscape Character Area *K1 Thornton to Queensbury* which falls within the *Type K Coalfield Edge Urban Fringe Farmland*. Within Appendix D, The Drg Ref No T0030,002 illustrates the surrounding topography.

Key Characteristics:

Topography, geology and drainage

- *The LCA comprises pockets of higher gently undulating ground sloping up from the Batley Fringe Incised Valleys (LCA G11);*
- *Shares a common geology with most of the District, with the Pennine Lower Coal Measures formation which is underlain by Millstone Grit;*
- *Minor watercourses originating from springs on the higher ground flow towards the surrounding valleys, creating the rolling landform.*

Woodland cover

- *Woodland is generally marginal, with strips and small blocks of deciduous trees remaining alongside major roads or along streams;*
- *Mature trees along field boundaries and within fields provide interest in the farmed and urban fringe landscape.*

Land use and field patterns

- *Extremely varied field pattern, ranging from very large arable fields to small pastoral land which results in a seasonal mosaic of colours and textures in the fields.*
- *Horse paddocks and equestrian enterprises are common around settlements.*
- *Some traditional hedgerows and stone walls remain, although often these have been replaced or supplemented by fencing.*
- *Golf courses on the fringes of settlements, including East Bierley Golf Club and Cleckheaton and District Golf Club.*

Semi-natural habitats

- *Few areas of semi-natural habitat, generally limited to riparian woodland and localised wetland habitats along streams.*
- *Archaeology and cultural heritage*
- *Disused coal shafts allude to the mining history of the area.*
- *Several Grade II listed buildings are concentrated around the Conservation Areas at East Bierley, Hartshead Moor Top and Scholes. These include a handful of manor houses.*

Settlement and road pattern

- *The main settlements in the area are Scholes, East Bierley and Oakenshaw, which often visually form a continuation of the surrounding urban areas.*
- *Within the rural fringes, there are scattered farmsteads with buildings of a traditional local stone vernacular.*
- *The area is crossed by many main roads connecting the large cities in the surrounding districts. The M62 with M606 bound many parts of the LCA.*

Views and perceptual qualities

- *From higher ground there are long views across the District and views into Bradford and Calderdale Districts. Views are fairly open due to lower levels of tree cover.*

- *Although this area is predominantly farmland with relatively small settlements, the surrounding urban centres and major transport corridors have a pervading influence, reducing levels of tranquillity.*

Valued landscape features and attributes:

Cultural and historical

- *Listed Buildings: There are a total of 16 Listed Buildings, all of which are Grade II listed.*
- *Conservation Areas: There are three Conservation Areas with land within the LCA; East Bierley, Hartshead Moor Top and Scholes (Cleckheaton).*
- *None of these assets are included on the Heritage at Risk Register.*

Perceptual qualities (including levels of tranquillity)

- *Although tranquil relative to the surrounding large areas of development, this LCA is perceived as an urban fringe landscape, with associated issues such as flytipping detracting from its semi-rural qualities. Large-scale pylons on the horizon detract from views in places, and the movement and sound of traffic has an overriding influence on tranquillity.*

Role as a setting to development

- *The LCA forms an immediate backdrop and 'gap' between settlements including Scholes, Hartshead Moor Top, East Bierley, Cleckheaton, Birkenshaw and Oakenshaw. The LCA also forms part of a wider setting to Bradford which is located to the north.*

Access and enjoyment of the landscape

- *This LCA is crossed by several rights of way including the Kirklees Way, Spen Valley Heritage Trail and National Cycle Route 66. There is a small area of Common Land at Toftshaw Moor, close to East Bierley.*

Contribution to the setting of the Peak District National Park

N/A



Distant view from Cliff Hollins Lane, looking south towards the site across LCA Coalfield Edge Urban Fringe Farmland

Kirklees Council Landscape Architects, Land south of Whitehall Road, Cleckheaton, Landscape Character Assessment, Site ID E1831, September 2015

The local assessment identified the site as local character area, **1 Fringe Farming**. The following text is extracted directly from the document and provides a detailed site description, which is listed below. Research illustrates the land has historically been farmland, with a previous smaller field pattern. Hedgerows have been gradually removed over the years to allow for greater efficiency in food production which inevitably requires the use of larger agricultural machinery.

Key Characteristics

- *Residential properties along Whitechapel Road B6120 that back onto a mixture of arable and pasture farmland of similar character to the site. Softy rolling topography, not flat and with some bands of trees to the north, north-west.*



View looking west on Whitechapel Road showing nearby residential properties and cemetery

Landform

- *Gentle incline from north to south*

Vegetation

- *Native hedgerows along field boundaries with some trees. A small area of parkland type tree planting in the south-east corner.*



Field boundaries of fencing and hedgerows vary in condition

Tree cover

- *Minimal tree cover mostly restricted to the south-east corner of the site.*



Open arable farmland with occasional semi-mature trees

Land Use

- *Large arable fields, smaller area of pasture in the south-east corner.*

Enclosure and views

- *The enclosure and divisions of the site are a mixture of native hedgerow, post and wire fence and remnants of dry stone wall within the site with intact stone walls to*

the south boundary. Views beyond are of a semi-rural, residential landscape with pockets of urban settlement and industrial and major roadways.



View from Whitechapel Road looking north

Settlement and buildings

- *Mixed residential strip of housing below the south boundary (not on the site) Farm buildings are included just inside the south site boundary.*



View of the site from the north east on the Spen Greenway bridge, with M62 in foreground

Transport and Access

- *The site is wedged between three roads, access can easily be gained from Whitcliffe Road (B6120) and Whitehall Road (A58). The M62 Motorway runs slightly to the east of the site but not along the boundary. The Spen Way Heritage Trail, PROW footpath*

SPE/24/30 edges the site in the south-east then run diagonally through the centre of the site toward the north-west.



View of the site from the Spen Valley Greenway Bridge over the A68

Landscape condition

- *The landscape is managed semi-improved grassland with large areas of arable. The landscape condition is **moderate**.*

Noise

- *There is a high level of traffic noise generated from the M62 Motorway to the south eastern edge of the site and to the northern extent, from the A58.*

Historical cultural

- *This has always been agricultural land. The farm building has been present on the site for approximately 200 years. By the 1920's the cemetery to the west and some dwellings have appeared along Whitcliffe Road at different time intervals up to present day.*

Subjective description.

- *Within the site it is easy to believe that the site is rural pleasant farmlands. The extensive traffic noise from the M62 motorway makes this site very much urban fringe towards the eastern extents.*

The Landscape Character report also defines the main strategies for the site as follows:

- **Conserve** where landscape character is strong, in good condition and has features, which distinguish the area from other areas.
- **Restore** where the underlying character is still reasonable strong but the overall Structure and individual elements and features are in decline.
- **Enhance** where the underlying character is weak with no clear defining structure, And where positive action is needed to create an improved landscape structure.
- **Create** where there is opportunity for a radical change to the existing landscape.

Conclusion:

Conserve and enhance, Condition: declining, Character: moderate

The area is of declining character due to the influence of traffic noise from nearby major roads. While the site itself is of moderate condition, sensitive and appropriate development will strengthen character. The site is of moderate landscape character suffering under the influence of the major roads around it. Landscape mitigation will be key for the development to act as a buffer to the urban fringe.

Site Description

Within Appendix D, Drg Ref No T0030.006 illustrates the existing site features. The site lies on a northeast facing slope. Field boundaries consist of gappy hedgerows and timber fencing to the north, east and west, in varying state of repair. The northern boundary on Whitechapel Road is a stone wall a characteristic feature of the locality in a good condition.

The land is currently used as arable farmland with a small area of the site adjacent to private residence used as pastureland. The land is surrounded by major highways with the M62 directly to the east, the A68 to the north and Whitechapel Road to the south. The sound of busy traffic is ever present.

On the southern boundary of the site lie the original collection of farm buildings, varying in age and architectural style. Adjacent to the site to the south west is the Whitechapel Road Cemetery, maintained by Kirklees Council and neighbouring allotments. There are a number of detached residential properties, one to two storeys high on Whitechapel Road with open views across the site.

The land offers open views to the north of the surrounding undulating countryside, with a mixture of industry, settlement, pastureland, trees and woodland. Landmark buildings locally distinctive in the view are areas of industrial business parks, light in colour and large scale on the far horizon and middle distance. The edge of Bradford is visible on the far horizon. A 400kv overhead electricity transmission line crosses the valley in the middle distance, acting as a strong visual detractor to the open views.

The SPEN Valley Heritage Trail, a regional footpath trail crosses adjacent to the site from the north west to the south east and then passes alongside the eastern boundary with the M62. The footpath is used by visitors completing the trail and also as a circular walk by local residents.

The SPEN Valley Greenway, (National Cycle Route No 66), formerly a disused railway is now used frequently as a bridleway/footpath by local residents and cyclists, located directly on the north east boundary. This route connects directly into Cleckheaton to the south and Oakenshaw to the north, and is part of the wider network connecting Manchester to Spurn Head in Humberside,

Other developments within the area

- The Highway Agency have future plans to make extensions to the M62 Junction 26. Details as yet unknown.
- Site Allocation H508, located on land east of the M62 north of Whitechapel Road is proposed within the Draft Local Plan for housing with a potential capacity of 170 dwellings

- Employment Allocation E1985a, located on the former North Bierley Waste Water Treatment Works, north of Junction 26. A planning application for industrial development on the site is currently under review.

Proposed Development

The report assumes the land, once allocated as employment use would contain industrial sheds, light in colour, maximum height of 12m, with a medium to large scale building footprint, typical of similar industrial estates within the locality. The report assumes highway access would be required from the A68 to the north and Whitechapel Road to the south, with ancillary infrastructure of highway, footpath, lighting and structural landscape.

We assume industrial scale buildings would be aligned with the contours to minimise cut and fill, on newly re-graded platforms. A spine road would be aligned north south connecting the A68 with Whitechapel Road with minor access roads to each individual plot. There would be opportunities for structural landscape and improved access and circulation for pedestrians, connecting with nearby cycle and footpaths present on the site perimeter.

Existing trees and boundary hedgerows would provide instant maturity to the site and be retained, protected during construction with further planting. Low lying areas of the site would be used for sustainable drainage attenuation.

Landscape Strategy

Landscape Analysis

Following desk top analysis of the site and surrounding area, a site visit was completed. Drg Ref No T0030.006 summarises the findings in relation to the site analysis of landscape features, the existing vegetation pattern, access and circulation, key views and potential vegetation that could be retained and enhanced for nature conservation and wildlife interest.

Approach

The findings of the desk top study and site appraisal initiate the requirement for development of a landscape strategy at an early stage to ensure landscape mitigation of potential adverse effects and enhancement strategies would be incorporated within the overall site layout. We advocate a 'green infrastructure', approach to ensure a robust design solution. We propose the following key themes to be considered within the future design of the masterplan:

- Landscape/Townscape Character;
- Access and circulation for pedestrians and cyclists;
- Informal recreation;
- Wildlife conservation and enhancement;
- Sustainable design;
- Climate change.

Drg Ref No T0030.007 illustrates the site constraints and potential landscape mitigation required to ensure an appropriate design solution.

Landscape/Townscape Character

- creation of an attractive green setting to encourage inward investment, providing an attractive distinctive working environment, that responds to the surrounding landscape character;
- respond to the local built form within nearby townscape in terms of scale, height and materials of the proposed built form;
- enhance existing green infrastructure by introduction of new structure planting and by the retention of existing field boundaries, (where feasible);
- creation of a green buffer to the north of Whitechapel Road to the existing residential properties to assist in mitigation of views from nearby residential properties. Also allow views northwards in between the new built form to the wider landscape beyond, to retain the appearance of openness;
- mitigate adverse potential visual effects from close up and long distance views by adding structure planting alongside field boundaries and within the development;
- incorporate green corridors of structure planting in between the large scale built form, to soften and green the appearance of the mass of large scale buildings from the long distance views;
- creation of open space buffer adjacent to the existing Cemetery on Whitechapel Road, to provide adequate protection to the existing TPO protected trees;
- enhance existing hedgerows by gapping up with additional hedgerow tree planting, specifying plant material suitable for the local conditions;

Access and Circulation

- ensure connections to the existing trails and routes circumventing the site are retained;
- create new linkages for pedestrians and cyclists, offering sustainable direct routes for commuters and visitors.

Informal Recreation

- Creation of multi-functional amenity space for local residents and employees. A variety of parkland planting ie street trees, copse, shrubs and grassland would provide an attractive parkland setting. The open space would also provide useful access to existing footpaths/cycle routes within the nearby open countryside.

Sustainable Design

- Creation of platforms using the existing topography to minimise cut and fill excavations and avoid construction of costly retaining structures;
- The addition of vegetation within green corridors will assist in surface water attenuation on these steep slopes, which inevitably when developed, would initiate an increased amount of impermeable surface, inevitably leading to an increase in surface water runoff;
- Creation of amenity open space with attenuation ponds to assist in mitigation of surface water runoff.

Wildlife conservation and enhancement

- creation of green corridors as multi-functional space, using variety of habitat for wildlife interest, connecting into the existing vegetation pattern, encouraging wildlife movements into and across the site;
- use a mixture of native and ornamental species to encourage wildlife interest;
- protection of existing TPO trees on adjacent landholding and vegetation within the site during construction contributes to the maturity of the development.

Climate Change

- Introduction of additional planting and use of attenuation ponds to reduce the potential impacts of climate change.
- Creation of wildlife corridors enables species movement and develops a richer more resilient biodiversity in the face of the changing climate.

Proposed mitigation during construction

The construction of the proposed development would follow a Construction Environmental Management Plan and Method Statements which would detail the proposed arrangements for soil removal, storage and replacement. Specific measures during construction would include:

- Land clearance and occupation would be limited to the necessary works;
- During excavation, subsoil and topsoil would be separated and retained in order to maximise the quality of the soil for reinstatement;
- Tracking of plant would be limited to the infrastructure location to minimise ground compaction to nearby areas;
- Existing trees and hedgerows would be protected during construction to the full extent of root area;
- Planting of the hedgerow, hedgerow and hedgerow trees would be carried out during the following planting season, on completion of the works.

Landscape effects

This section examines the effects arising as a result of the proposed development with reference to the potential operational effects on the existing landscape fabric, landscape character and potential effects on landscape character during construction.

Potential effects on the existing landscape fabric

Changes to landscape fabric can occur where there would be direct physical changes to the landscape. The total area of arable farmland required for construction of the built form and highway would be approximately 8 to 12ha. Extensive earthmoving and installation of built form and infrastructure would have a considerable effect on the existing landscape of the site. Existing vegetation would be retained and protected during construction where feasible. Mitigation measures of the addition of new woodland, hedgerows, tree groups, attenuation ponds and wildflower meadow would assist in enhancement of the built form and the local landscape character and condition.

Potential effects on local landscape character area

In Appendix D, Drg Ref No T0030.005 illustrates the location of the landscape character areas and types within the study area. The following assessment is undertaken with reference to the LCA K1 Coalfield Edge Urban Fringe Farmland Thornton - Queensbury

The effect of the Proposed Development on landscape character largely depends on the key characteristics of the receiving environment; the degree to which the development may be considered to be consistent with or at odds with it; and how the proposal would be perceived within its setting, with perceptions influenced by, distance, weather conditions and the design and appearance of the proposed development.

LCA K1 Coalfield Edge Urban Fringe Farmland Thornton - Queensbury

The key characteristics and features of the LCA are listed within the section on Landscape Character. The effects on the LCA would be direct (affecting the landform of the site itself) and indirect (affecting the visual and perceptual characteristics of the wider landscape).

Landscape sensitivity considers the susceptibility of the landscape character area (LCA) and its value. The LCA does not fall within a landscape designation. Appendix B illustrates the evaluation of the sensitivity of the LCA in detail which is considered to have a **low** sensitivity to proposed development. The local area is considered to be susceptible to change with a capacity for change of use. There are other similar types of industrial development within adjacent landscape character areas, visible from the site.

The ZVI coverage, illustrated on Drg Ref No T0030.004 illustrates that the potential visibility extends to the boundary of the 2km study area and beyond. Due to the undulating topography, vegetation and built form, fieldwork noted that the potential visibility is further restricted. Views of proposed development would be visible from within the LCA.

Following a change of land use from agriculture to employment, the magnitude of change within the LCA is considered to be **major** which would result in a **moderate** effect, which is not considered to be significant. The effects would be permanent, adverse due to change in land use and beneficial due to landscape enhancement and improvement of condition.

Potential effects on landscape designations

None present.

Potential effects on landscape character during construction

The works would give rise to landscape effects during construction, with earthmoving equipment re-grading the land, site activity, flood lighting, access road, and signage and traffic management required on adjacent highway. Direct effects would be concentrated within the site itself. The construction activities would result in a **slight** magnitude of change locally within a 0.1km radius resulting in **minor** effects. The effects would be short term, localised and not considered significant.

Cumulative effects in relation to landscape character

With several proposed developments and allocation of land use from open land to residential and employment land proposed within the LCA K1 (**low** sensitivity) locally, it is considered that there would be cumulative effects in relation to the landscape character within the 2km study area. Due to the proximity of these proposed developments in relation to the site, it is considered the magnitude of change would be **moderate** with an overall **moderate/minor** effect on the local landscape character, which is not considered to be significant.

Visual effects

The visual assessment examines the magnitude of change and potential effects on the visual amenity of people who have or will experience views of the proposed development. This section draws on the results of the viewpoint analysis and fieldwork observations. It considers the potential effects of the change in land use on the visual amenity of the following groups of potential receptors:

- Residents;
- Pedestrians on the nearby public rights of way;
- Vehicle users of nearby minor highway,;
- Users of recreation and tourist destinations, key viewpoints.

Further details regarding the methodology used for the visual assessment are set out in Appendix A.

The potential landscape and visual effects that would arise from the change in land use have been assessed in two ways;

- Zone of Visual Influence maps to provide a general overview of potential visibility within the defined 2km study area;
- Assessment of the visual effects from six viewpoints representative of potential receptors. These findings are presented in Appendix D on Drg Ref No T0030.008 to 0014.

Zone of Visual Influence

Drg Ref No T0030.003 illustrates the zone of visual influence (ZVI) within a 2km study area, based on the construction of built form at a height of 12m at existing ground levels. The ZVI does not take into consideration built form and vegetation, consequently this is a worst case scenario.

The ZVI illustrates a potential visibility across all compass directions of the study area with the exception of localised low points. Fieldwork undertaken during winter, confirmed the actual potential extent of visibility is much less than shown due to the presence of intervening built form and surrounding woodland screening views from all directions. Visibility would be reduced further during the summer months, with foliage present.

Viewpoint assessment

A viewpoint assessment has been carried out at a selection of key viewpoint locations to assess the likely magnitude and significance of landscape and visual effects arising as a result of the proposed development. Six viewpoints were selected. The viewpoints are assessed in Appendix D and the locations shown on Drg Ref No T0030.002.

At this early stage of design, the visual assessment has been completed with the assumption that proposed development would cover the total site area with ancillary infrastructure at Year 0, without mitigation of plant growth by structure planting. The assessment therefore considers the '*worst case scenario*'. Assuming at Year 10, structure planting is in place within and surrounding the site, any potential adverse effects would be reduced.

Visual effects – Designated Landscapes

None present

Visual effects – Heritage assets

Listed Buildings

Within the 2km study area, 27 No Listed Buildings/Structures were identified. The heritage assets are isolated farmsteads at distance from the site or located buildings/features within settlement. Due to distance and intervening built form and vegetation, it is not anticipated significant visual effects would arise due to the proposed change in land use.

Conservation Area of Scholes and Hartshead

The site was not found to be visible from either Conservation Area due to the intervening built form and vegetation.

Visual effects – Residential receptors

Scholes

Due to the intervening built form and vegetation, the proposed development would not be visible from the bulk of properties within the settlement of Scholes.

A number of residential properties on Whitechapel Road would have an open view to the north of proposed development. The Landscape Strategy proposes that development should be set back from the roadside to allow a green buffer between the properties and development. Viewpoint 4, Drg Ref No T0030.008 illustrates the existing view from this location. The magnitude of change from these small number of properties on Whitechapel Road would be **moderate**, resulting in a **moderate/major** effect. Due to the close proximity to the site it is considered that the effects in relation to visual amenity would be significant.

Following the establishment of the landscape mitigation proposals, within 10 years, the views of development would be softened by the intervening tree and shrub planting. The effects are considered to be **neutral** overall, adverse due to change in land use from farmland to employment land and beneficial due to improvements in public access and wildlife conservation.

Wyke Common

Due to intervening topography, built form and vegetation the proposed development would not be visible from the settlement of Wyke. Viewpoint 5 illustrates the view from the A68/Cow Close Lane junction in proximity to residential properties. The properties have a north south aspect with the site visible at an oblique angle. The rooflines of taller built form would be visible above the intervening buildings. The magnitude of change would be **slight** with a **moderate** effect, which is not considered to be significant. The effect would be **adverse**.

Cleckheaton

Due to the intervening built form and vegetation, the proposed development would not be visible from the bulk of properties within the settlement of Cleckheaton.

Oakenshaw, Wyke, Hartshead, Hunsworth, Drub, Hightown

Due to the intervening built form and vegetation, the proposed development would not be visible from the bulk of the properties. Due to the distance from the site, it is not considered any potential visual effects would be significant from these settlements.

Visual effects – Public Rights of way and Bridleway users

The potential visual effects of the change in land use from agriculture to employment use experienced by those walking and cycling on the local footpath/bridleway network have been considered with reference to fieldwork, ZVI and viewpoint analysis. The sensitivity of these routes is considered to be **high**.

Views would be experienced transiently and would be in part restricted by the screening effect of intervening vegetation and landform. The orientation of different sections of a route would be seen at an oblique angle or behind the direction of travel. As such, views would not be experienced uniformly. We have selected representative viewpoints to illustrate potential effects on the local visual amenity from the following footpaths:

Viewpoint 1: Spen Valley Greenway

The National Cycle Route 66, the Spen Valley Greenway is located on the northern perimeter of the site and is used frequently by visitors to the area and local residents. Views to the south from the bridge crossing the A68 highway have open views across the southern part of the

site. The magnitude of change at Viewpoint 1 is considered to be **substantial** at Year 1, **moderate** at Year 10, with a **major** effect at Year 1 and **major/moderate** effect at Year 10 which is considered to be significant. The effects would be permanent and **neutral**, adverse due to change in land use from farmland to built form and beneficial due to introduction of green infrastructure visible within the view.

Viewpoint 2: PROW SPE/47/20 local footpath at Drub village

This local footpath is used frequently by local residents. There are open views to the south with the site visible in the far distance. The magnitude of change at Viewpoint 2 is considered at Year 1 and 10 to be **negligible** with a **moderate/minor adverse** effect which is not considered to be significant.

Viewpoint 3: PROW SPE/36/10, Kirklees Way, looking north

This local long distance trail is used frequently by visitors and local residents. There are views across farmland to the north towards the site. The magnitude of change at Viewpoint 3 is considered at Year 1 and 10 to be **slight** with a **moderate adverse** effect which is not considered to be significant.

Viewpoint 6: Spen Valley Heritage Trail, PROW SPE/24/10

There are open views to the south when walking from the trail from Oakenshaw. The magnitude of change at Viewpoint 6 is considered to be at Year 1, **slight**, with a **moderate adverse effect** due to distance. The site is only partly discernible in the view in the far distance. At Year 10, the site is considered to be **negligible**, with a **moderate/minor adverse** effect which is not considered to be significant.

Visual effects – Highway users

The potential visual effects of the Proposed Development experienced by those travelling on the local highway network have been considered with reference to fieldwork, ZVI and viewpoint analysis. The sensitivity of these routes is considered to be **medium to low** depending on type of road and potential speed of travel.

Views would be experienced transiently and would be in part restricted by the screening effect of intervening vegetation, landform. The orientation of different sections of a route would be seen at an oblique angle or behind the direction of travel. As such, views would not be experienced uniformly.

M62

As the motorway is located within a cutting below the site, there is nil visibility of the site from users of the M62 motorway. Vehicle users would be travelling at high speeds and potential significant effects are not considered likely from this route.

A68

When travelling in an east to west direction, views are restricted as the highway is in a cutting with roadside planting restricting views to the south. When travelling in a west to east direction there are open views to the east. Viewpoint 5 illustrates the existing view. At Year 1 and Year 10, the magnitude of change from the A68, on the edge of the settlement of Wyke is considered to be **moderate** with a **moderate/minor adverse** effect which is not significant.

Whitechapel Road

Viewpoint 4 illustrates the existing view from Whitechapel Road looking directly north across the site. Vehicle users would view the site at an oblique angle while travelling at speed. At

Year 1 and Year 10 the magnitude of change is considered to be **medium**, effect to be **moderate adverse** which is not significant.

Visual effects – Tourist, Recreational Destinations

None present

Visual effects during construction

The visual effects during construction would be temporary and intermittent and minimised by good site management and a short construction programme. There would be visibility of operations associated with construction of the new commercial and residential properties, excavation of the access road and vehicle movements to and from the site on the adjacent highways. There would be close up views from the nearby residential receptors and users of the A68, Whitechapel Road and public rights of way. The magnitude of change would vary depending on location of the viewer from **substantial to moderate**, resulting in **major/moderate** effects. For potential receptors at distance on nearby roads and distant footpaths there would be **minor/none** effects. The adverse effects during the construction phase would be for a limited duration.

Cumulative effects in relation to visual amenity

The proposed developments on land adjacent to Junction 62 on the land east and north of the M62 are not visible from the site, nor its local surroundings, therefore a cumulative effect would not occur in relation to visual amenity.

Conclusions

The site is located on a north facing slope overlooking a broad valley containing industry, settlement, highway and transmission infrastructure with open views to the north. The site is contained by woodland to the south, east and west which assist in restricting immediate views to the wider landscape and townscape.

The Landscape Strategy advocates a green infrastructure approach to be adopted during the masterplan process in mitigation of potential effects on existing features, landscape character and visual amenity.

The effect on the local landscape character area, K1 Coalfield Edge Urban Fringe Farmland Thornton – Queensbury, of low sensitivity is considered to be major, with a moderate effect which is considered not significant. Residual landscape effects would arise in relation to local landscape character due to the change in land use from arable farmland to employment use. Adopting the green infrastructure approach will bring benefits to the local amenity and wildlife conservation, with the change from arable farmland with a limited biodiversity value to an industrial park with landscape infrastructure.

The existing landscape features of hedgerow and occasional semi-mature trees would be retained where feasible. The effects on the existing landscape fabric would be significant due to the adverse change in land use. There would be beneficial effects with improvements to the existing landscape fabric with enhancement of existing vegetation and introduction of variety of wildlife habitat, woodland, scrub, meadow, hedgerow and pond features.

In relation to visual amenity, significant residual visual effects would occur at locations in closest proximity to the site, to the north on the Spen Greenway Cycle Route. The view from the cycle route is a transient view and effects would reduce over time with further growth of intervening vegetation. Significant effects would occur to the south to a small number of

residential properties on Whitechapel Road. Detailed design with a greening approach would soften the potential visual effects over time.

The construction phase would incur significant effects on the landscape fabric locally and also in relation to visual amenity for local residential, recreational and highway receptors. The effects would be temporary and intermittent of a short term duration.

In relation to potential cumulative effects of the site development on landscape character and visual amenity with other known developments in the locality it is considered the effects would not be significant.

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Appendix A: Methodology

Landscape Effects

Assessing the Landscape Effects requires methodical consideration of each effect identified and, for each one, assessment of the sensitivity of the landscape receptors and the magnitude of the effect of the landscape.

The initial landscape appraisal begins with a baseline study, which includes data collection and a desktop review of information relating to the components, character and scenic quality of the townscape, and landscape, including:

- Ordnance Survey maps
- Aerial photographs
- Relevant planning policy and guidance
- Landscape, historic and environmental designations; and
- National, regional and local scale landscape character assessments.

The objective of the baseline study for the landscape is to provide an understanding of the landscape in the area that may be affected – its constituent elements, its character, spatial patterns, its geographic extent, its history, its condition, the way in which landscape is experienced and the value attached to it. This information is then reviewed alongside the description of the Proposed Development to form the basis for the identification and description of the changes that will result in the landscape effects of the proposal.

Landscape Sensitivity

The landscape receptors are firstly assessed in terms of their sensitivity, which combines judgements of their **susceptibility to change** to the type of development proposed and the **value** attached to the landscape. The susceptibility to change according to the GLVIA3 means *the ability of the landscape receptor to accommodate the Proposed Development without undue consequences for the maintenance of the baseline conditions and/or the achievement of landscape planning policies and strategies.* Judgements in relation to susceptibility are recorded as High, Medium or Low and include assessment of the physical and aesthetic characteristics and the potential scope for mitigation.

Examples and further guidance on the evaluation of landscape sensitivity are provided below:

- **High:** Landscape character, characteristics and elements which would generally be of lower landscape capacity or scope for landscape change and high landscape value and quality. These are landscapes that may be considered to be of particular importance to conserve and which may be particularly sensitive to change if in appropriately dealt with.
- **Medium:** Landscape character, characteristics and elements where there would be a medium landscape capacity or some scope for landscape change. Often include landscapes of medium landscape value and quality which may be locally designated.
- **Low:** Landscape character, characteristics and elements where there would be higher landscape capacity or scope for landscape change to accommodate the proposed type of development. Usually applies to landscapes with a lower landscape susceptibility or higher landscape capacity for the Proposed Development.

The level of landscape effects are defined in relation to the individual development and its location, using well informed and reasoned judgements.

Landscape Value

The value of the landscape receptors is established in the baseline conditions and covers the value of the Landscape Character Types and Areas that may be affected, based on review of any designations at both national and local level. It should be noted that the presence or absence of designations does not dictate the value assessment and are only indications of likely value judgements. Where there are no designations, judgement is based on the value of individual contributors to landscape character, especially the key characteristics, which may include individual elements of the landscape, particular landscape features, and notable aesthetic and perceptual or experiential qualities. The table below, taken from the GVLIA provides an indicator of the values attached to landscape designations when assessing landscape value.

GVLIA Box 5.1: Range of factors that can help in the identification of valued landscape

Landscape quality (condition)	Measure of the physical state of the landscape.
Scenic quality	Landscapes that appeal to the senses (primarily but not wholly the visual senses)
Rarity	Presence of rare elements or features in the landscape or the presence of a rare LCT
Representativeness	Whether the landscape contains a particular character and/or features or elements which are considered particularly important examples
Conservation interests	Presence of features of wildlife, earth science, archaeological or historic and cultural interest can add to the value of the landscape as well as having value in their own right
Recreation Value	Evidence that the landscape is valued for recreational activity where experience of the landscape is important
Perceptual aspects	A landscape may be valued for perceptual qualities, notably wilderness and/or tranquillity
Associations	Artists, writers or events in history that contribute to perceptions of the natural beauty of the area.

The judgements regarding susceptibility and value of the landscape receptor are identified within the sensitivity table included within Appendix B.

Magnitude of Change for Landscape Receptors

The magnitude of change for landscape receptors arising from the Proposed Development is classified as substantial, moderate, slight or negligible, again dependent on interpretation of a number of factors, but unlike assessments of sensitivity, these are largely quantifiable. Each effect of the Proposed Development on landscape receptors then needs to be assessed in terms the following criteria:

- degree or loss or alteration to key landscape features/elements or characteristics;
- distance from the development;
- duration of effect;
- landscape backdrop to the development;
- landscape context of other build development, particularly vertical elements;
- in order to differentiate between different levels of magnitude the following definitions are provided in the table below:

Criteria for assessing magnitude of change for Landscape Receptors

Level	Typical Criteria
Substantial	<ul style="list-style-type: none"> • Total loss of or major alteration to key elements/features/characteristics of the baseline landscape. • Introduction of elements considered to be totally uncharacteristic in the context of the baseline landscape altering the aesthetic or perceptual aspects of the landscape. • Removal of elements considered to be important aesthetic or perceptual aspects of the landscape. • Landscape effects felt over a large geographical scale, influencing several landscape types or character areas.
Moderate	<ul style="list-style-type: none"> • Partial loss of or alteration to key elements/characteristics of the baseline landscape. • Introduction of elements that may be prominent but may not necessarily be considered substantially uncharacteristic in the context of the baseline landscape and moderately altering the aesthetic or perceptual aspects of the landscape. • Removal of elements considered to contribute to aesthetic or perceptual aspects of the landscape. • Landscape effects at the scale of the landscape type or character area within which the proposal lies.
Slight	<ul style="list-style-type: none"> • Minor loss of or alteration to key elements/features/characteristics of the baseline landscape. • Landscape effects within the immediate setting of the site and at site level.
Negligible	<ul style="list-style-type: none"> • Very minor loss of or alteration to key elements/features/characteristics of the baseline landscape.

Visual Sensitivity

Visual receptors are represented by people, meaning the particular person or group of people likely to be affected at a specific viewpoint. As in the landscape assessment the visual sensitivity is assessed in terms of the susceptibility to change in views and visual amenity as well as the value attached to particular views.

The susceptibility of different visual receptors to changes in views and visual amenity depends upon the occupation or activity of people experiencing the view at different locations and the extent to which their attention or interest may therefore be focused on the views. As in the landscape assessment, visual receptor susceptibility to change is defined as high, medium, low or negligible as follows:

Criteria for assessing the sensitivity of visual receptors to change

Level of susceptibility to change	Type of visual receptor
High	<ul style="list-style-type: none"> • Residential properties – ground floor • Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience • Beauty spots, public viewing areas and picnic areas • people, whether residents or visitors, who are engaged in outdoor recreation, including the use of public rights of way, whose attention or interest is focused on the landscape and on particular views • Communities where views contribute to the landscape setting enjoyed by residents in the area
Medium	<ul style="list-style-type: none"> • Residential properties with less significant views from living rooms/gardens • Walkers using local networks of footpaths and tracks • Transport users of local roads, train lines, rivers and canals
Low	<ul style="list-style-type: none"> • Those engaged in outdoor sports or recreation which does not involve or depend upon appreciation of views of the landscape • Those using major roads and motorways in the region • People at their place of work whose attention may be focussed on their work or activity, not on their surroundings, and where the setting is not important to the quality of working life
Negligible	<ul style="list-style-type: none"> • Views from towns, conurbations and heavily industrialised areas

Judgements are also made about the value attached to the views experienced. This takes into account the following:

- Recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations;
- Indicators of the value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment and references to them in literature or art.

The sensitivity of the visual receptors is then calculated by combining the susceptibility to change and the visual value. If the susceptibility to change is high and the visual value is high, then the sensitivity of the visual receptor would be judged as high. If the susceptibility to change is low and the visual value is low, then the sensitivity of the visual receptor would be judged as low.

Magnitude of Change for Visual Receptors

The magnitude of change for visual receptors arising from the Proposed Development is classified as substantial, moderate, slight or negligible, again dependent on interpretation of a number of factors, but unlike assessments of sensitivity, these are largely quantifiable. Each effect on visual receptors then needs to be assessed in terms of its size or scale, the geographical extent or the area influenced and takes into account:

- Distance of viewpoint from the development;
- Proportion of the field of view occupied by the development (measured as a percentage of the views presented in the photomontages);
- Orientation or angle of view to the centre of the development;
- Background to the development;
- Extent of other built development, especially vertical elements.

Criteria for assessing magnitude of change for Visual Receptors

Level	Typical Criteria
Substantial	A large number of sensitive receptors experiencing a major or fundamental change in nature of the baseline view, particularly in near views with the baseline urban skyline substantially changed.
Moderate	A moderate, but not fundamental, change in nature of view affecting a notable number of sensitive receptors. Open, uninterrupted views with some middle distance obstruction of part of that view resulting from the Proposed Development; baseline urban skyline not adversely infringed in view typically seen over medium/long distance,
Slight	Minor but non material change in nature of view; long distance views across urban landscape panorama, or restricted views (upstairs bedroom windows only) with relatively few receptors affected.
Negligible	Changes unlikely to be perceived by the majority of visual receptors.

Significance of Effects for Landscape and Visual Receptors

The purpose of an assessment of the landscape is to identify any significant effects on landscape and visual amenity arising from the Proposed Development. In this report the level of effect on landscape and visual amenity arising from the combined effects of sensitivity and magnitude are assessed and then professional judgement applied to assess whether the effect is significant or not.

Thresholds determining significance are not provided in the EC Directive 2011/12/EU or the Town and Country Planning (England and Wales) (Environmental Impact Assessment) Regulations 2011. The report provides a guide to correlating sensitivity to change and magnitude of change, in order to determine the significance of effects. However, professional judgement using the combined criteria of sensitivity and magnitude is used to determine the overall level of effects. The level of landscape and visual effects has been assessed as major, moderate, minor or none. As is now common practice, these categories have been determined by considering the combination of landscape or visual sensitivity with the predicted magnitude of change.

Correlation of Sensitivity & Magnitude of Change to determine Significance of Effects

Landscape & Visual Sensitivity	High	Moderate/ Minor	Moderate	Major/ Moderate	Major
	Medium	Minor	Moderate/ Minor	Moderate	Major/ Moderate
	Low	Minor/ None	Minor	Moderate/ Minor	Moderate
	Negligible	None	Minor/ None	Minor	Moderate/ Minor
		Negligible	Slight	Moderate	Substantial
	Magnitude of Change				

In this report, those effects described as Major and Major/Moderate are considered to be significant effects as required by the Town and Country Planning (England and Wales) (Environmental Impact Assessment) Regulations 2011. These are the effects that the assessor considers to be material in the decision making process.

Type of Effect

Landscape and visual effects are described with reference to type (direct, indirect, secondary or cumulative), timeframe, (short, medium, long term, permanent and temporary) and whether they are positive and negative (beneficial or adverse). The various types of effect are described as follows:

Temporary/Residual effects

If a proposal would result in an alteration to an environment whose attributes can be quickly recovered then judgements concerning the significance of effects should be tempered in that light. Commercial development applications typically include permanent, long term elements as well as minor alterations to landform resulting in residual landscape and visual effects.

Direct/Indirect

Direct and indirect landscape and visual effects are defined in the ‘Guidelines for Landscape and Visual Impact Assessment (GVLIA). Direct effects are defined as ‘*result directly from the development itself,*’ (Para 3.22). An indirect or secondary effect is one that results ‘*from consequential change resulting from the development,*’ (Para 3.22) and is often produced away from the proposed development or as a result of a secondary association. The direct or physical effects of a proposed development are generally limited to an area around the development itself.

Beneficial/Adverse

Landscape and visual effects can be beneficial or adverse and in some cases neutral. Beneficial effects upon landscape receptors may result from changes to the landscape involving positive enhancement measures or through the addition of well-designed features which add to the landscape experience or sense of place in a complimentary manner. In relation to adverse effects, changes to a rural landscape involving construction of manmade objects of a large scale are generally considered to be adverse, as they are not usually actively promoted as part of a district wide landscape strategy and therefore in the assessment of effects they are assumed to be adverse, unless specified otherwise.

It is important to recognise that there are occasions whereby the visual effects may be considered as adverse or beneficial. This depends on the viewer's disposition towards change within the landscape and also the principle of commercial building features within the landscape. Taking a precautionary note in making an assessment of the 'worst case scenario', the assessment considers that all effects on views which would result for the construction and operation of the Proposed Development (in particular the buildings, roads and hard standing) to be adverse, unless specified otherwise in the text, it is noted, however, that not all people would consider the effects to be adverse.

Visualisation Methodology

Zone of Visual Influence

A computer generated Zone of Visual Influence (ZVI) Map has been prepared to assist in viewpoint selection and to indicate the potential influence of the development in the wider landscape.

The ZVI map has been prepared at 1:20,000 scale to indicate the extent of potential visibility on the basis of bare ground and will not include the screening effects of established hedgerow and tree cover or built elements. The ZVI map indicates areas from which it may be theoretically possible to secure views of part, or parts of the Proposed Development. However, use of the ZVI map needs to be qualified on the following basis:

- There are a number of areas within the ZVI from which there is potential to view parts of the proposal, but which comprise open agricultural, or other land where the general public do not have regular access;
- The large scale ZVI does not take into account for the screening and filtering effects of intervening features such as buildings, trees, woodland and hedgerows;
- The ZVI does not account for the likely orientation of the viewer – for example when travelling.

In addition, the accuracy of the ZVI has to be considered. In particular, the 20,000 scale ZTV map will be generated from Ordnance Survey (OS) Landform Panorama Digital Terrain Data (gridded height data at 50m intervals). The resolution of this model cannot accurately represent small scale terrain features, which can otherwise give rise to inaccuracy in the predicted visibility. This can lead to an underestimation of visibility eg a raised area of ground permitting views over an intervening obstruction – or can lead to an overestimation of visibility – such as where a roadside embankment obscures a view.

Photography

The appraisal of landscape and visual effects was carried out from representative selection of viewpoints. The viewpoint analysis is illustrated with reference to illustrative material, comprising photographs.

The photography was undertaken in accordance with accepted good practice and the Landscape Institute guidance on Photography and Photomontage in Landscape and Visual Assessment. The baseline photography has been undertaken with a high quality digital camera with full frame sensor and a 50mm fixed focal length lens in combination with a panoramic head equipped tripod in accordance with accepted good practice. The resulting photos are combined into panoramas using specialist computer software (ie Adobe Photoshop).

Photosheets of the baseline situation have been produced for Viewpoints 1, 2, 3, 4, 5 and 6.

All of the photosheets have been produced to record an approximate 70 degrees angle of view, illustrating a reasonable extent of view experienced at the viewpoint which provides an indication of the visual context of the development. In this assessment, the visualisations will be presented with a comfortable viewing distance of 525mm.

Appendix B: Landscape Character: Sensitivity

The land falls within the Landscape Character Area defined as the ‘*K Coalfield Edge Urban Fringe Farmland, K1 Thornton to Queensbury.*’ Landscape sensitivity is not absolute and can only be defined in relation to each development and location taking into account the susceptibility to change and value as mentioned in Appendix A. To understand the sensitivity of a particular landscape and its location it is good practice to consider a range of criteria as set out in the table below.

Factors affecting the sensitivity of the LCA: <i>the susceptibility to change</i>	Characteristics of the K Coalfield Edge Urban Fringe Farmland K1 Thornton – Queensbury (<i>Quotes in italics are from the Kirklees LCA 2005</i>)	Low Sensitivity	Low	Med	High	High Sensitivity
Physical						
Scale	Broad Valley	Large scale featureless landscape, broad valleys, gently undulation with largescale field pattern	*			Small scale, intimate landscape
Landform	<i>‘pockets of higher gently undulating ground’</i>	Smooth regular flowing, flat, uniform landscape		*		Dramatic, undulating, rugged, complex landscapes
Land cover	<i>Extremely varied field pattern, ranging from very large arable fields to small pastoral land which results in a seasonal mosaic of colours and textures in the fields. Horse paddocks and equestrian enterprises are common. Golf courses on the fringes of settlements. Farmland, villages, isolated farmsteads, disused land, highway and transmission infrastructure</i>	Extensive areas of simple regular uniform land cover		*		Complex, intimate or mosaic
Texture		Simple and sweeping lines, linear features and patterns		*		Complex or irregular pattern
Built Environment	<i>main settlements in the area are Scholes, East Bierley and Oakenshaw, which often visually form a Continuation of the surrounding urban areas. Within the rural fringes, there are scattered farmsteads with buildings of a traditional local stone</i>	Contemporary masts, pylons, industrial elements, buildings infrastructure, settlement	*			Established, traditional or historic built form

Factors affecting the sensitivity of the LCA: <i>the susceptibility to change</i>	Characteristics of the K Coalfield Edge Urban Fringe Farmland K1 Thornton – Queensbury (<i>Quotes in italics are from the Kirklees LCA 2005</i>)	Low Sensitivity	Low	Med	High	High Sensitivity
	<i>Vernacular.</i>					
Presence of features which detract from the landscape	<i>Area is crossed by many main roads connecting the large cities in the surrounding districts. The M62 with M606 bound many parts of the LCA. Large-scale pylons on the horizon detract from views in places</i>	Major roads, electricity infrastructure, renewables, industrial development	*			Few features present
Perceptual						
Wildness/Sense of Remoteness	<i>movement and sound of traffic has an Overriding influence on tranquillity.</i>	Busy evidence of human activity	*			remote, peaceful, tranquil, solitude and emptiness
Perception of Change	<i>The LCA forms an immediate backdrop and 'gap' between settlements including Scholes, Hartshead Moor Top, East Bierley, Cleckheaton, Birkenshaw and Oakenshaw. The LCA also forms part of a wider setting to Bradford which is located to the north.</i>	Dynamic or modern landscapes	*			Ancient landscape, designed landscapes or with obvious historic continuity
Visual						
Landscapes that form settings, skylines, backdrops, focal points		Generally low lying landscape without distinctive landform or horizon		*		Areas with strong features, focal points that define the setting or skyline

Factors affecting the sensitivity of the LCA: <i>the value</i>	Characteristics of the K Coalfield Edge Urban Fringe Farmland K1 Thornton – Queensbury (<i>Quotes in italics are from the Kirklees LCA 2005</i>)	Low Value	Low	Med	High	High Value
Value						
Landscape quality (condition)	Reference: Kirklees Council Landscape Character Assessment of the site			*		
Scenic quality	<i>Urban fringe landscape, with associated issues such as fly tipping detracting from its semi-rural qualities. Large-scale pylons on the horizon detract from views in places, and the movement and sound of traffic has an Overriding influence on tranquillity.</i>	No specific designation	*			National or regional designated landscape, National Park, AONB,
Rarity		Commonplace	*			Rare
Conservation interests	Listed Buildings: There are a total of 16 Listed Buildings, all of which are Grade II listed. Conservation Areas: There are three Conservation Areas with land within the LCA; East Bierley, Hartshead Moor Top and Scholes (Cleckheaton). <i>None of these assets are included on the Heritage at Risk Register</i>		*			
Recreation Value	<i>This LCA is crossed by several rights of way including the Kirklees Way, Spen Valley Heritage Trail and National Cycle Route 66.</i> <i>There is a small area of Common Land at Toftshaw Moor, close to East Bierley</i>	Limited amenity function		*		Well used for amenity/recreation, especially for National Trails and long distance routes
Perceptual aspects		Busy, chaotic	*			Wild and tranquil
Cultural associations		No specific cultural associations	*			Artistic or literary associations
Overall Rating for Sensitivity of the LCA K1 Thornton to Queenbury			Low			

Appendix C: Viewpoint Assessment

A viewpoint assessment has been carried out on a selection of key viewpoint locations to assess the likely magnitude of landscape and visual effects arising as a result of the addition of the proposed development. Fieldwork was completed within the zone of potential visibility and five viewpoints were chosen. The location of the viewpoints is shown on Figure 7, and the existing/predicted views are illustrated within Appendix D.

The method of assessment is described in Appendix A Methodology. The approach involves viewpoint analysis to predict the magnitude of change at each of the representative viewpoints based on fieldwork observations, computer modelling, measurement of parameters and professional judgement. This is then correlated with the sensitivity of the landscape/visual receptor to give an overall impact. The assessment takes into account screening afforded by intervening topography, vegetation and built form. It assumes weather conditions, although the influence of different weather sunlight and visibility conditions is also considered.

No	Viewpoint	Distance from the proposed development	Direction	Representative	Sensitivity
1	Spenn Valley Greenway / National Cycle Route No 66	0.4km	S 180°	Recreational users, cyclists and pedestrians	High
2	Public Footpath, PROW SPE/47/20, Drub village looking SW	2.1km	SW 245	Recreational users, walkers	High
3	Public Footpath, PROW SPE/36/10, Kirklees Way, looking N	0.86km	NE 30°	Recreational users, cyclists and pedestrians	High
4	Whitechapel Road, looking NE	0.01km	NE 30°	Residential properties at ground floor	Medium
5	A58/PROW Bradford South21, looking W, edge of Wyke	0.95km	SE 110°	Highway users, recreational users, residential properties	Low for highway users, High for recreational users and residents
6	Public Footpath PROW SPE/24/10, looking SE, edge of Oakenshaw	1.3km	SE 162	Recreational users, pedestrians	High

At this early stage of design, the potential layout of development and landscape infrastructure is unknown. The visual assessment has been completed with the assumption that proposed development would cover the total site area with typical ancillary infrastructure of highway and structure planting on the site perimeter and within the development as green corridors as shown on the Landscape Strategy Plan. The assessment is undertaken at Year 1, without mitigation of plant growth which therefore considers the 'worst case scenario' and again at Year 10, after plant growth. The aim would be to reduce any potential adverse effects on local visual amenity.

Viewpoint	Location	Description of View at Year 1 and Year 10 (With Planting Mitigation)	Visual effects		
			Receptor sensitivity	Magnitude of Change	Effects on Receptor
PUBLIC RIGHTS OF WAY/BRIDLEWAYS					
1	Spenn Valley Greenway /National Cycle Route No 66, at road bridge over the A68	<i>Existing:</i> Oblique views from the cycle track looking south towards the site onto open farmland which rises to the horizon. The A68 visible in the foreground with passing vehicles at speed acts as a visual detractor.	High	Substantial	Major
		<i>Proposed at Year 1:</i> Partial low level screening by vegetation growing on the highway cutting of the A68 and on cycle way would provide filtered views of new built form. Built form would be present, on terraces on the slope up to the horizon. Due to proximity to the site, a wide angle of the view would be altered from farmland to built form.			
		<i>Proposed at Year 10:</i> With growth of planting on the highway embankment, the cycle route and also within the site on site perimeter and within the development, the proposed built form would be partially screened with filtered views from the cycle way. Built form due to height would remain visible on horizon.	High	Moderate	Major/Moderate
2	Public Footpath, PROW SPE/47/20, Drub village looking SW	<i>Existing:</i> Distant view of the site on the opposite valley slope, back dropped by vegetation and properties on the ridgeline. The valley slope covered by a range of landuses from woodland, farmland, industry and settlement. <i>Proposed at Year 1:</i> Built form and infrastructure would be visible, discernible by scale and colour of industrial style of architecture. Back dropped by topography and vegetation. A minor element of the view.	High	Negligible	Moderate/Minor

Viewpoint	Location	Description of View at Year 1 and Year 10 (With Planting Mitigation)	Visual effects		
			Receptor sensitivity	Magnitude of Change	Effects on Receptor
		<i>Proposed at Year 10:</i> Built form and infrastructure further screened by plant growth surrounding and within the site, indiscernible from variety of landuses. Similar style of industrial development present in the view on the valley floor	High	Negligible	Moderate/Minor
3	Public Footpath, PROW SPE/36/10, Kirklees Way looking N	<i>Existing:</i> Farmland present in foreground and middle distance with residential properties of Whitechapel Road visible on horizon partially screened by garden planting. School playing fields visible in distance. Visual detractors of overhead power lines. Traffic noise present. Right of way used by cyclists and dog walkers to gain access to Cleckheaton beneath the M62.			
		<i>Proposed view at Year 1:</i> The roof top of the taller buildings of development may potentially be visible on the horizon partially screened by intervening built form and vegetation.	High	Slight	Moderate
		<i>Proposed view at Year 10:</i> The roof top of the taller buildings of development may potentially be visible on the horizon partially screened by intervening built form and vegetation.	High	Slight	Moderate
6	SPEN Valley Heritage Trail, Public Footpath PROW SPE/24/10, looking SE	<i>Existing:</i> Views southwards in direction of footpath. Open pastureland present in foreground and middle distance with overhead transmission lines a visual detractor. The site discernible in far distance, back dropped by vegetation and biform of properties at Cleckheaton and on Whitechapel Road.			
		<i>Proposed view at Year 1:</i> Rooflines of proposed built form would be discernible in far distance due to scale and colour, back dropped potentially in part by topography, vegetation and built form.	High	Slight	Moderate

Viewpoint	Location	Description of View at Year 1 and Year 10 (With Planting Mitigation)	Visual effects		
			Receptor sensitivity	Magnitude of Change	Effects on Receptor
6	SPEN Valley Heritage Trail, Public Footpath PROW SPE/24/10, looking SE,	<i>Proposed view at Year 10:</i> Rooflines of proposed built form would be discernible in far distance due to scale and colour, back dropped potentially in part by topography, vegetation and built form. Structure planting would soften the potential visual effect further,	High	Negligible	Moderate/Minor
HIGHWAY USERS					
4	Whitechapel Road, looking NE	<p><i>Existing:</i> From the roadside, open distant views northwards across the southern part of the site with the edge of the City of Bradford on the horizon. Transient views at an oblique angle of view by a vehicle user, while travelling at speed.</p> <p><i>Proposed view at Year 1:</i> Built form and green infrastructure would be visible in foreground and middle distance partially blocking distant views.</p> <p><i>Proposed view at Year 10:</i> Green infrastructure would develop partially screening views of the built form and distant views. Due to distance a wide angle of view would be altered from farmland to employment business park setting.</p>	Medium	Moderate	Moderate
5	A58/PROW Bradford South21, looking W, edge of Wyke	<p><i>Existing:</i> The site is currently not visible from this location due to intervening topography and vegetation</p> <p><i>Proposed at Year 1 and 10:</i> The rooflines of the built form would be partially visible above the intervening vegetation. At Year 10, less of the roofline would be visible due to growth of the structure planting within the site.</p>	Low	Moderate	Moderate/Minor

Viewpoint	Location	Description of View at Year 1 and Year 10 (With Planting Mitigation)	Visual effects		
			Receptor sensitivity	Magnitude of Change	Effects on Receptor
RESIDENTIAL PROPERTIES					
4	Whitechapel Road, looking NE (Ground floor)	<p><i>Existing:</i> From the roadside, open distant views northwards across the southern part of the site with the edge of the City of Bradford on the horizon. Perimeter boundary wall in the foreground. From the residential properties there would be partial screening by the garden planting of hedgerow, trees and shrubs.</p> <p><i>Proposed at Year 1:</i> Built form would be partially visible in the middle distance blocking the open views to the north. Intervening green infrastructure and highway would be present in the foreground.</p> <p><i>Proposed at Year 10:</i> Green infrastructure would develop in the foreground partially screening views of the built form and distant views. Due to distance a wide angle of view would be altered from farmland to employment business park setting.</p>	High	Moderate	Moderate/Major
			High	Moderate	Moderate/Major
5	A58/PROW Bradford South21, looking W, residential properties at the end of Cow Close Lane, Wyke Common (ground level)	<p><i>Existing:</i> At an oblique angle from the properties, the site is not visible.</p> <p><i>Proposed Year 1 and Year 10:</i> The rooflines of the built form would be partially visible above the intervening vegetation. At Year 10, less of the roofline would be visible due to growth of the structure planting within the site.</p>	High	Slight	Moderate

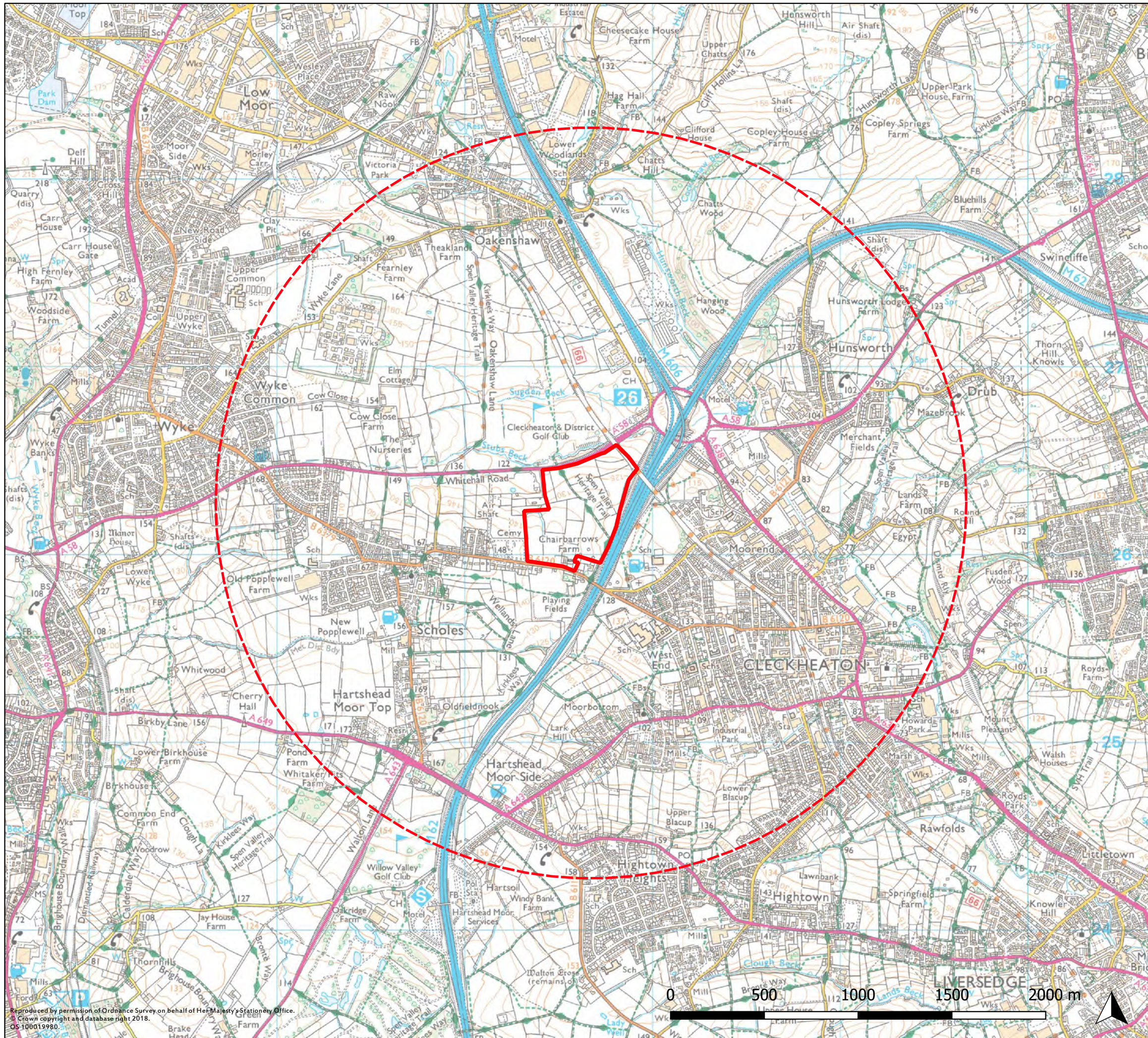
Appendix D: Figures

Figures

T0030.001_PL00	Site Location plan
T0030.002_PL00	Topography and Viewpoint Location
T0030.003_PL00	Environmental & Landscape Planning Designations
T0030.004_PL00	Landscape Character Areas
T0030.005_PL00	Zone of Visual Influence
T0030.006_PL00	Landscape Analysis
T0030.007_PL00	Landscape Strategy

Photosheets

T0030.008_PL00	Photosheet: Viewpoint 1: SPEN Valley Greenway
T0030.009_PL00	Photosheet: Viewpoint 2: PROW SPE/47/20 Drub Village
T0030.010_PL00	Photosheet: Viewpoint 3: PROW SPE/36/10, looking north
T0030.011_PL00:	Photosheet: Viewpoint 4: Whitechapel Road, looking north east
T0030.012_PL00:	Photosheet: Viewpoint 5: A58 looking west, edge of Wyke
T0030.013_PL00 of Oakenshaw	Photosheet: Viewpoint 6: PROW SPE/24/10, looking SE edge



Legend

- Site Boundary
- - - Study Area Boundary (2km)

Notes:

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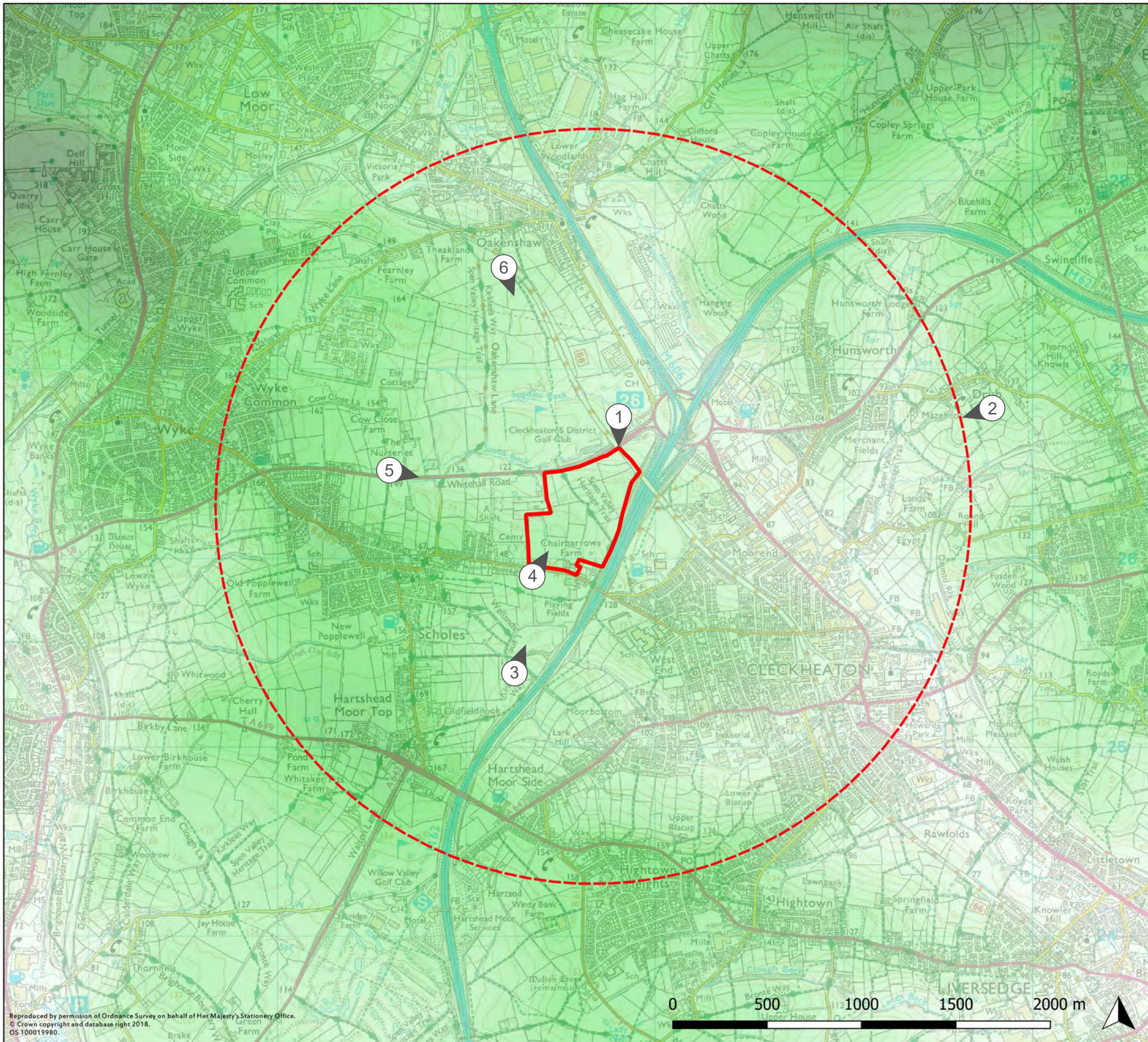
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Project Title
Land at Whitechapel Road, Cleckheaton, West Yorkshire

Drawing Title
Site Location Plan

Drawing Reference No.	Date	Drawn	Checked
T0030.001_PL00	Jan 2018	KW	SF
Scale	Client.	Rev.	
1:20,000 @ A3	Newsmith Farms Ltd	A	

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Legend

- Site Boundary
- - - Study Area Boundary (2km)

Topography

- 58.8
- 81
- 103
- 125
- 148
- 170
- 192
- 212
- 230

Viewpoints

1. SPEN VALLEY HERITAGE TRAIL
2. PROW SPE/47/20 at Drub
3. PROW SPE/36/30 South of Scholes
4. Whitechapel Road
5. A58/PROW SPE/27/20 Edge of Wyke
6. PROW SPE24/20 Edge of Oakenshaw

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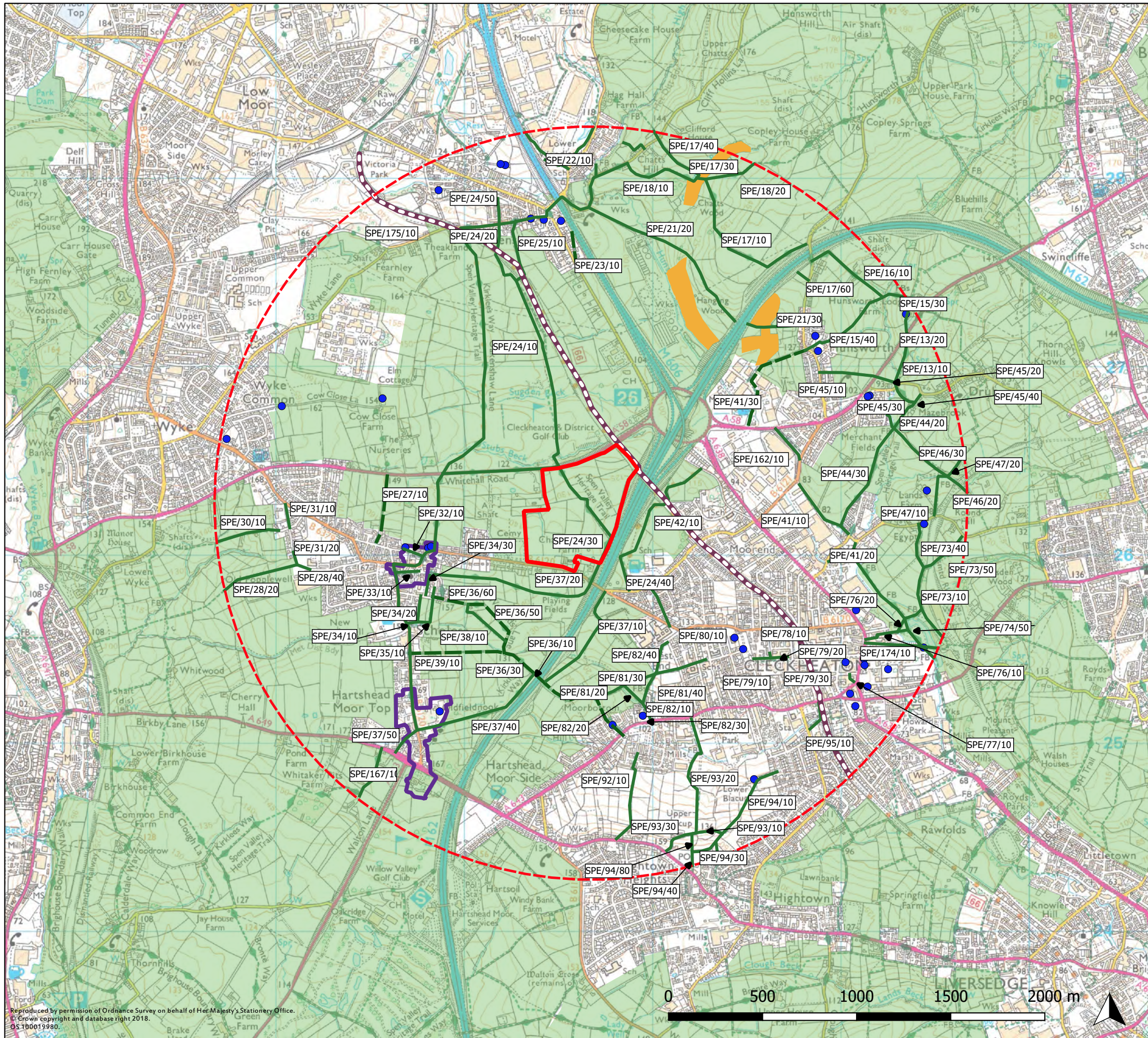
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Project Title
Land at Whitechapel Road, Cleckheaton, West Yorkshire

Drawing Title
Topography & Viewpoint Location

Drawing Reference No.	Date	Drawn	Checked
T0030.002_PL00	Jan 2018	KW	SF
Scale	Client.	Rev.	
1:20,000 @ A3	Newsmith Farms Ltd	A	



Legend

- Site Boundary
- - - Study Area Boundary (2km)
- Listed Buildings
- Conservation Areas
- Ancient Woodland
- Greenbelt
- - - National Cycle Route 66
- Public Rights of Way
- - - Bridleways
- Footpaths

Notes:

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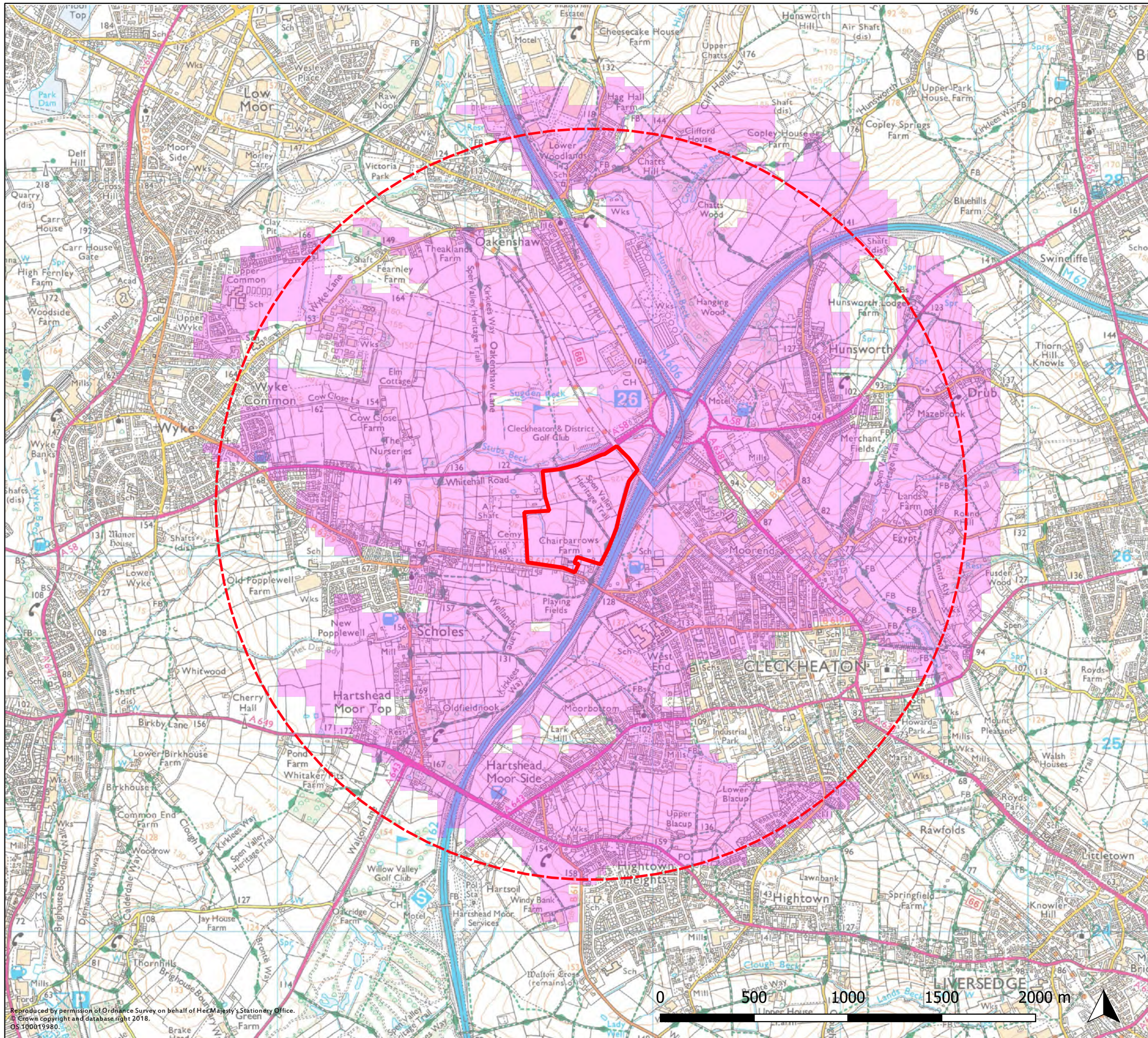
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Project Title
Land at Whitechapel Road, Cleckheaton, West Yorkshire

Drawing Title
Environmental & Landscape Planning Designations

Drawing Reference No.	Date	Drawn	Checked
T0030.003_PL00	Jan 2018	KW	SF
Scale	Client.		Rev.
1:20,000 @ A3	Newsmith Farms Ltd		A



Legend

- Site Boundary
- - - Study Area Boundary (2km)
- Zone of Visual Influence

Notes.

This figure has been based on the built form of 12m for the extents of the site.

The landform data is from Ordnance Survey Landform Panorama Digital Terrain data (gridded height data at 50m intervals)

The visibility map is calculated for a viewer's eye height of 1.7m above ground level.

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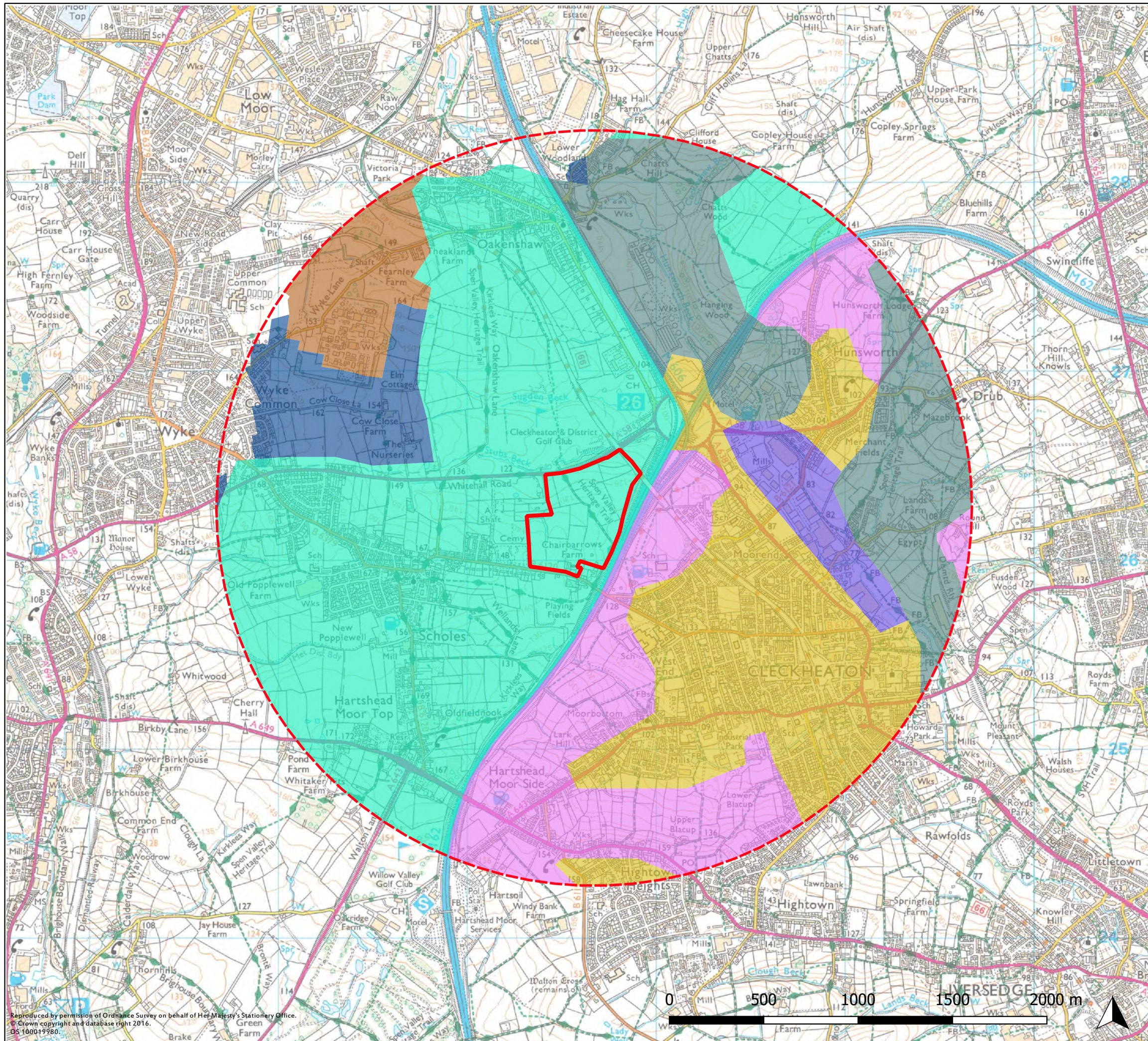
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Project Title
Land at Whitechapel Road, Cleckheaton, West Yorkshire

Drawing Title
Zones Of Visual Influence

Drawing Reference No.	Date	Drawn	Checked
T0030.004_PL00	Jan 2018	KW	SF
Scale	Client.	Rev.	
1:20,000 @ A3	Newsmith Farms Ltd	A	



Legend

- Site Boundary
- - - Study Area Boundary (2km)

Kirklees District

- Rural Fringes
Batley - Dewsbury
- Coalfield Edge Urban Fringe Farmland
Thornton - Queensbury
- Wooded Rural Valleys
Bately Fringe Incised Valleys
- Industrial / Business Parks
- Urban

South Bradford

- Industrial Corridor
- Enclosed Pasture

Notes.

Landscape character areas copied from Kirklees District Landscape Character Assessment Report 2015 & South Bradford Landscape Character Supplementary Planning Document 2008. Boundaries approximate only.

Blank areas within the 2km Study Area are part of Bradford Urban Core.

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Project Title

Land at Whitechapel Road, Cleckheaton, West Yorkshire

Drawing Title

Landscape Character Areas

Drawing Reference No.	Date	Drawn	Checked
T0030.005_PL00	Jan 2018	KW	SF
Scale	Client.	Rev.	
1:20,000 @ A3	Newsmith Farms Ltd	A	



KEY

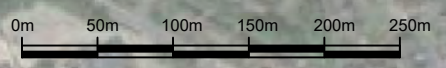
- SITE BOUNDARY
- EXISTING HEDGEROWS
- EXISTING TREES
- EXISTING WOODLAND
- GAS EASEMENT
- EXISTING PEDESTRIAN/ CYCLE ROUTE
- EXISTING PUBLIC RIGHT OF WAY
- EXISTING WATERCOURSES
- RESIDENTIAL PROPERTIES. (2-3 Storeys)
- PUBLIC OPEN SPACE

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Land at Whitechapel Road, Cleckheaton, West Yorkshire

Title	Landscape Analysis	Date	Jan 2018
Drawing No.	T0030.006_PL00	Scale	1:5000 @ A3
Drawn By.	KW	Format	PDF
		Sheet	1/1
		Rev.	A



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KEY

- SITE BOUNDARY
- ↔ ACCESS LINKS FOR EASE OF PEDESTRIAN/ CYCLE CIRCULATION PROVIDE CONNECTIVITY TO EXISTING ROUTES
- - - PEDESTRIAN/ CYCLE LINKS TO NEARBY ROUTES / PROW
- ▨ PROPOSED STRUCTURE PLANTING PROVIDES GREEN CORRIDORS FOR INFORMAL RECREATION & WILDLIFE MOVEMENT & SUSTAINABLE DRAINAGE

GREEN EDGE SCREENS VIEWS TO WEST, PROVIDING OPPORTUNITIES FOR SUDs/ OPEN SPACE

GREEN EDGE TO CEMETERY

GREEN CORRIDORS ASSIST IN MITIGATION OF VISUAL IMPACTS OF LARGE INDUSTRIAL UNITS FROM LONG DISTANCE VIEWS

GREEN FRONTAGE ONTO WHITECHAPEL RD ASSISTS IN IMPACT ON VISUAL AMENITY FROM NEARBY RESIDENTIAL PROPERTIES

PROPOSED INDUSTRIAL UNITS TO BE ALIGNED WITH EXISTING CONTOURS TO MINIMISE CUT AND FILL

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Land at Whitechapel Road, Cleckheaton, West Yorkshire

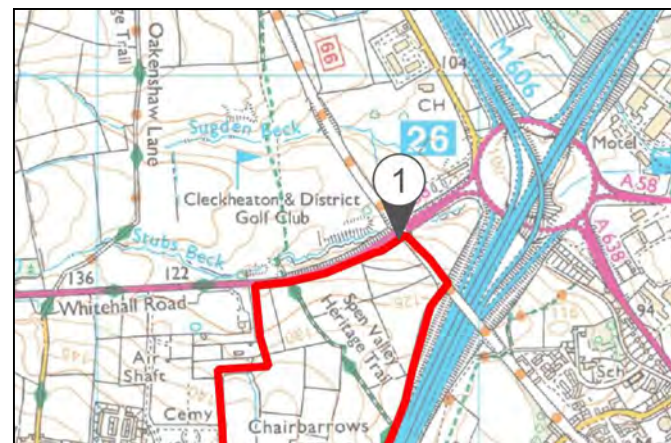
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Drawing No.	T0030.007_PL02	Scale	1:5000 @ A3
Drawn By.	KW	Format	PDF
		Sheet	1/1
		Rev	C

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Viewpoint 1 - Spen Valley Greenway / National Cycle Route No 66



Location Plan



Ordnance Survey ©100019980. Not to scale

Viewpoint Information

Grid Reference: 417783, 426615
Ground Height: 116m AOD
Camera Height: 1.5m
Included Angle: 70
Direction of view: S 180°
Distance to centre of site: 396m
Viewing Distance: 525mm
Camera Used: FujiFilm X-E1 with a Fuji non-fixed Lens, F35mm, F1.4R (equivalent to 49mm SLR lens)

Project Title:			
Land at Whitechapel Road, Cleckheaton, West Yorkshire			
Drawing Title:			
Photosheet 1 : Viewpoint 1			
Drawing Ref No.	Date.	Drawn	Checked
T0030.008_PL01	Jan 2018	KW	SF
Paper	Client.	Rev.	
A3	Newsmith Farms Ltd	A	

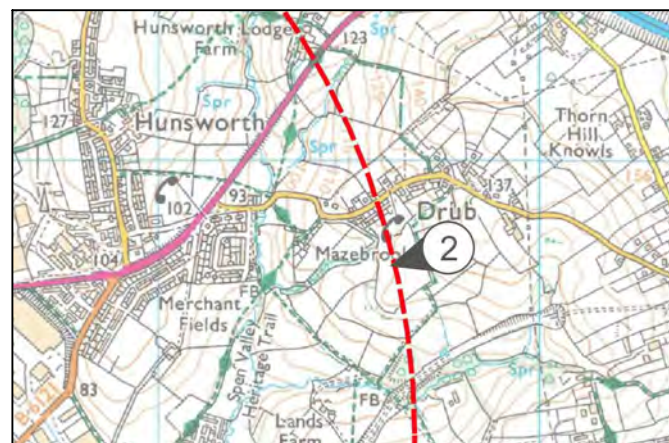
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Viewpoint 2 - Public Footpath, PROW SPE/47/20, Drub village looking SW



Location Plan



Ordnance Survey ©100019980. Not to scale

Viewpoint Information

Grid Reference: 419685, 426778
Ground Height: 122m AOD
Camera Height: 1.5m
Included Angle: 70
Direction of view: SW 245°
Distance to centre of site: 2140m
Viewing Distance: 525mm
Camera Used: FujiFilm X-E1 with a Fuji non-fixed Lens, F35mm, F1.4R (equivalent to 49mm SLR lens)

Project Title:			
Land at Whitechapel Road, Cleckheaton, West Yorkshire			
Drawing Title:			
Photosheet 2 : Viewpoint 2			
Drawing Ref No.	Date.	Drawn	Checked
T0030.009_PL00	Jan 2018	KW	SF
Paper	Client.	Rev.	
A3	Newsmith Farms Ltd	A	

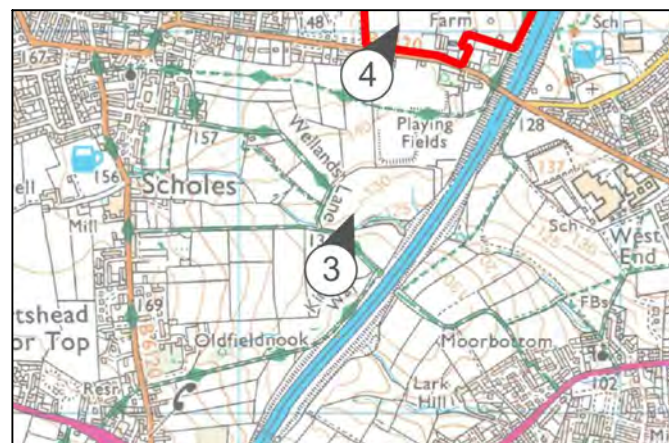
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Viewpoint 3 - Public Footpath, PROW SPE/36/10, looking N



Location Plan



Ordnance Survey ©100019980. Not to scale

Viewpoint Information

Grid Reference: 417280, 425484
Ground Height: 134m AOD
Camera Height: 1.5m
Included Angle: 70°
Direction of view: NE 30°
Distance to centre of site: 864m
Viewing Distance: 525mm
Camera Used: FujiFilm X-E1 with a Fuji non-fixed Lens, F35mm, F1.4R (equivalent to 49mm SLR lens)

Project Title:			
Land at Whitechapel Road, Cleckheaton, West Yorkshire			
Drawing Title:			
Photosheet 3 : Viewpoint 3			
Drawing Ref No.	Date.	Drawn	Checked
T0030.010_PL00	Jan 2018	KW	SF
Paper	Client.	Rev.	
A3	Newsmith Farms Ltd	A	

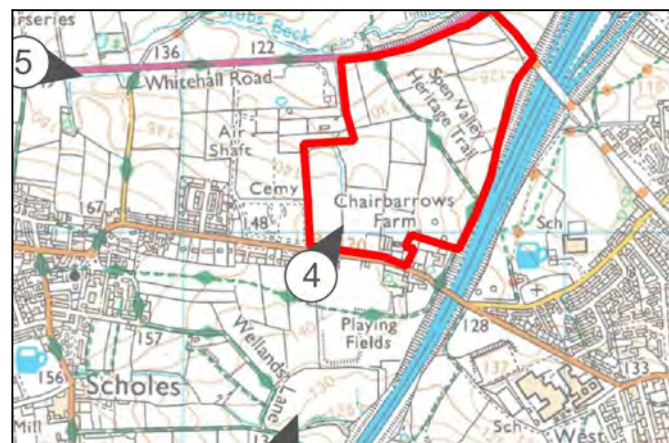
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Viewpoint 4 - Whitechapel Road, looking NE



Location Plan



Ordnance Survey ©100019980. Not to scale

Viewpoint Information

Grid Reference: 417372, 425945
Ground Height: 148m AOD
Camera Height: 1.5m
Included Angle: 70°
Direction of view: SW 245°
Distance to centre of site: 2140m
Viewing Distance: 525mm
Camera Used: FujiFilm X-E1 with a Fuji non-fixed Lens, F35mm, F1.4R (equivalent to 49mm SLR lens)

Project Title:			
Land at Whitechapel Road, Cleckheaton, West Yorkshire			
Drawing Title:			
Photosheet 4 : Viewpoint 4			
Drawing Ref No.	Date.	Drawn	Checked
T0030.011_PL00	Jan 2018	KW	SF
Paper	Client.	Rev.	
A3	Newsmith Farms Ltd	A	

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Viewpoint 5 - A58/PROW Bradford South21, looking W, edge of Wyke



Location Plan



Ordnance Survey ©100019980. Not to scale

Viewpoint Information

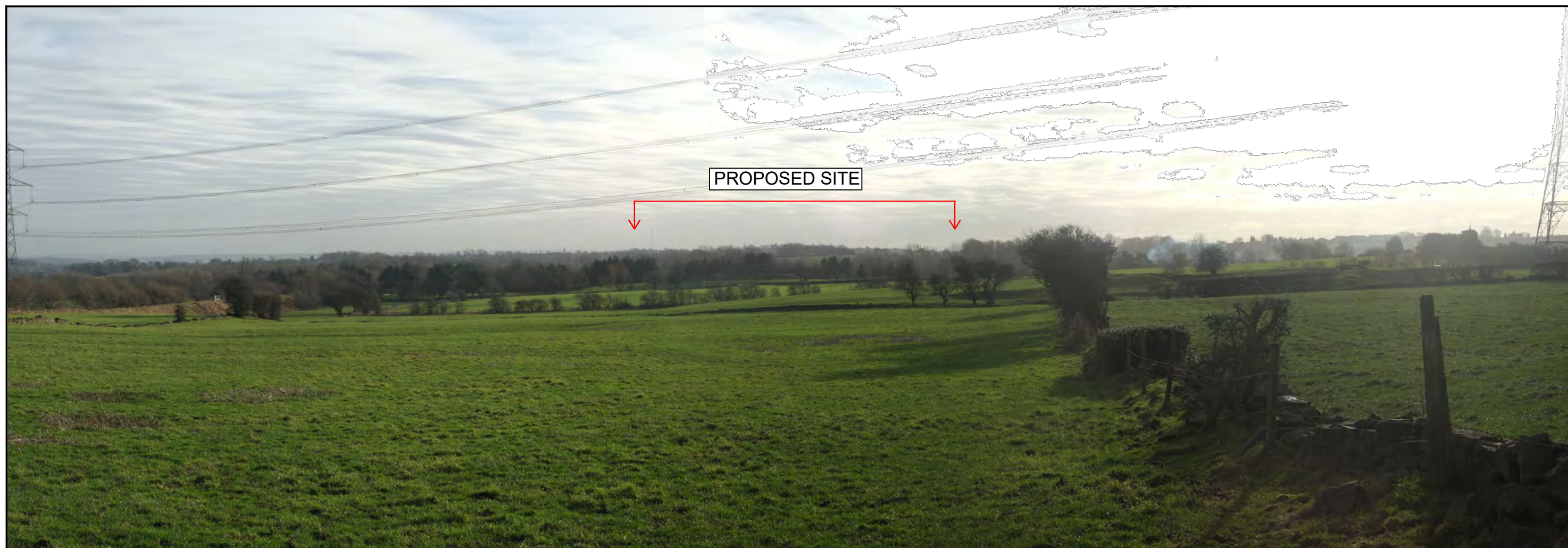
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Ground Height: 145m AOD
Camera Height: 1.5m
Included Angle: 70°
Direction of view: SE 110°
Distance to centre of site: 950m
Viewing Distance: 525mm
Camera Used: FujiFilm X-E1 with a Fuji non-fixed Lens, F35mm, F1.4R (equivalent to 49mm SLR lens)

Project Title:			
Land at Whitechapel Road, Cleckheaton, West Yorkshire			
Drawing Title:			
Photosheet 5 : Viewpoint 5			
Drawing Ref No.	Date.	Drawn	Checked
T0030.012_PL00	Jan 2018	KW	SF
Paper	Client.	Rev.	
A3	Newsmith Farms Ltd	A	

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Viewpoint 6 - Public Footpath PROW SPE/24/10, looking SE, edge of Oakenshaw



Location Plan



Ordnance Survey ©100019980. Not to scale

Viewpoint Information

Grid Reference: 417217, 427494
Ground Height: 135m AOD
Camera Height: 1.5m
Included Angle: 70°
Direction of view: SE 162°
Distance to centre of site: 1300m
Viewing Distance: 525mm
Camera Used: FujiFilm X-E1 with a Fuji non-fixed Lens, F35mm, F1.4R (equivalent to 49mm SLR lens)

Project Title:			
Land at Whitechapel Road, Cleckheaton, West Yorkshire			
Drawing Title:			
Photosheet 6 : Viewpoint 6			
Drawing Ref No.	Date.	Drawn	Checked
T0030.013_PL00	Jan 2018	KW	SF
Paper	Client.	Rev.	
A3	Newsmith Farms Ltd	A	

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Document Status and Approval Schedule

Issue	Status	Description	Prepared by Signed/Dated	Reviewed by Signed/Dated
V1	FINAL		SF, 24/01/18	AG, 24/01/18

Disclaimer

This Report was completed by Topia Landscape Architects on the basis of a defined programme of work and terms and conditions agreed with the Client. We confirm that in preparing this Report we have exercised all reasonable skill and care, taking into account the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project.

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Any questions or matters arising from this Report should be addressed in the first instance to the Project Manager.

January, 2018

PLANNING
SUPPORT
STATEMENT

PROPOSED EMPLOYMENT SITE – REPRESENTATION
TO KIRKLEES COUNCIL
LAND OFF WHITECHAPEL ROAD, CLECKHEATON

Job No.2503

acumen
PLANNING

In association with

Turley

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SECTION 1: INTRODUCTION

1. This Statement has been prepared to promote this site as a strategic employment site in the Kirklees Local Plan. The site located between Whitechapel Road and Whitehall Road, in Cleckheaton is approximately 25ha. The development of this site will bring about a range of employment premises, primarily for advanced manufacturing, precision engineering and distribution.
2. Using the accepted proportion that approximately 35% of site area is built development (the remainder being parking, service areas, access roads and landscaping) the site could accommodate circa 86,000sqm of commercial (employment) uses.
3. This report supports the proposed allocation of the site for employment uses. It sets out the exceptional circumstance required to justify the release of the site from Green Belt and supports the Council's decision to include the site as a future employment allocation.
4. The site is identified as a draft employment allocation (reference E1831) in the "*Publication Draft Local Plan – Allocations and Designations*" DPD which is currently subject to Examination in Public. The Publication Draft Local Plan – Strategy and Policies, identifies a requirement for 165ha of net additional employment land.
5. The site, which is used for agricultural purposes, currently lies in the Green Belt. Kirklees is characterised by historically tight Green Belt boundaries, challenging topography and a limited number of sites which are situated to make best use of the District's key transport infrastructure, most notably the M62.

SECTION 2: VISION AND SITE DESCRIPTION

Vision

6. The site has the potential to become an attractive sub-centre for employment for the Metropolitan Borough of Kirklees. Using the existing transport infrastructure the site has the opportunity to attract investment to this location. This opens up possibilities of regenerating the surrounding towns and villages which will strongly benefit local communities with new prospects. This site has the potential to build upon the legacy of industrial & manufacturing traditions of Kirklees which has existed for over two centuries.
7. The site's excellent location in close proximity to the M62 and M606 and its size means it can become a key source for employment opportunities for Kirklees, creating significant employment opportunities for residents of Kirklees, reducing the need to commute to locations such as Leeds, Wakefield and Bradford.
8. The Kirklees Sustainability Appraisal Matrices for employment sites explains that the accessibility 'heat mapping' work that has been undertaken on behalf of Kirklees Council has been analysed to identify the number of working age people (those aged 16-64) that live within 20 minutes travel time of each employment

site option, taking into account non-car based modes of transport. It shows 10,424 people (aged 16-64) would be able to access this site via sustainable transport within 20 minutes; which is considered to be a minor positive effect.

The Site

9. The site is located within the ward of Cleckheaton between Oakenshaw to the north and Cleckheaton to the south. The A58 Whitehall Road borders the site to the north and B6120 Whitechapel Road to the south. The M62 runs along the south eastern boundary of the site and the M606 is in close proximity to the north-east.
10. A linear row of low density houses run along the southern side of Whitehall Road to the south, and to the west is a cemetery. To the north west of the site is a wholesale nursery and garden centre. To the north of the site, on the opposite side of Whitehall Road is an 18 hole Golf Course.
11. Access to the site would be taken off Whitehall Road to the north, which provides immediate access to Chain Bar roundabout, forming junction 26 of the M62, providing access to the motorway network.
12. The site lies in close proximity to several key commercial developments which currently provide accommodation to businesses in the manufacturing arc. These are the Euroway estate, which lies to the north; West 26, which lies to the south; and Low Moor, which lies to the north-west. Whilst the 'arc' has a wider geographical base, these more local developments have historically provided for the design, manufacture and distribution of components (or Original Equipment Manufacture - 'OEM' - businesses). These traditional locations are now highly-constrained in terms of available property, quality of property and room to expand.
13. The site slopes from the south-west down to the north east, with the northern part of the site to be developed as phase 1 which will facilitate the internal infrastructure and re-grading of the remainder of the site.
14. The total developable area of the site is 24.57 hectares.
15. The site is in an accessible location via sustainable modes of transport, with the site being accessible by a range of modes other than the private car. There are no bus services along Whitehall Road, however there are four services per hour operating along Whitechapel Road. There are additional bus services on Bradford Road within 400m of the site access. The pedestrian network in the vicinity of the site is generally good quality.
16. There is a high pressure regional gas pipelines that partially cross a section of the site which need to be considered in the design and construction phases of the development.

17. The site currently lies within the Green Belt, but the land has little environmental value other than being grade 3 agricultural land. Due to the location of the site it does not prevent urban sprawl and merging towns. This is because Cleckheaton has the M1 and M606 which act as a physical barrier which prevents these factors from taking place.
18. The land has a motorway verge stretching along the North-East and South-East site boundary which separates the land from the M62 and the roundabout at junction 26. This verge and the land to the North-East contains deciduous woodland which is part of an England Habitat inventory that acts a physical buffer zone.
19. The site also contains three Tree Preservation Orders (TPOs) to the South-East. Two of these are located north of The Royds, 280 Whitechapel Road. Their TPO ID's are 08/81/g2 & 08/81/g3. The third TPO ID is 08/81/t4 which is located opposite the Pavilion on Whitechapel Road. These TPO's do not need to be harmed in any employment development due to their location they can be incorporated into future designs without complications.

SECTION 3: KIRKLEES EMPLOYMENT STRATEGY

20. Kirklees Council and the wider Leeds City Region (LCR) Local Enterprise Partnership are committed to boosting the manufacturing sector with particular focus being afforded to the precision engineering and advanced manufacturing sectors. Large flat sites, with good access access to the motorway junctions and proximity to a skilled workforce will be required to deliver on these objectives.
21. In their Economic Strategy Council concluded that the current land portfolio is insufficient both in terms of quantum and quality. Past take up of land has seen predominantly minor extensions and new builds which have generally served SME operations already existing within the local economy but have limited opportunity to secure inward investment opportunities and growth aspirations of the district's larger indigenous businesses.
22. In order to deliver the overarching economic benefits for Kirklees and the Leeds City Region, a review of the district's current employment land supply was undertaken. This has enabled the Council to rationalise this stock to ensure that only land which is suitable for modern business and industry operations is retained. The Council assessed a number of alternative employment sites. Those which have been accepted are considered to be suitable, deliverable and sustainable, and are located in areas where market demand exists.
23. The Council's accepted employment allocations comprise a range of different sized sites to serve a range of occupier demand from SMEs to larger occupiers. The evidence provided within this report provides further justification that there is a market demand for the larger accepted sites and that the subject site for this report is deliverable.

24. The Employment Needs Assessment Technical Paper sets out that evidence from various sources is consistent and points towards a lack of supply of sites that are of sufficient size. It also points out that *“it is important to understand the locational needs of businesses that would be willing to occupy these larger sites. Evidence of the employer’s survey suggests key location criteria include:*
- *Proximity to the major road network (including motorway junctions),*
 - *Avoidance of congestion;*
 - *Further land/expansion opportunities;*
 - *Access to the workforce;*
 - *Parking Provision; and*
 - *An Attractive environment.”*
25. The same technical paper sets out that work undertaken by Bilfinger GVA in 2015 found that the *“Proximity to the M62 / key motorway junctions presents the greatest opportunity to attract strategic demand and therefore national and regional occupiers. Proximity to the M62 is often stated as the number one requirement of an occupier (5 miles / 5 minutes distance is seen as the limit for some occupiers)”*
26. They continue to state that *“Development activity is increasing but developers, occupiers and investors have become more selective. There continues to be a strong preference for quality sites in good locations benefiting from good connectivity, particularly to the strategic road network.”* (Kirklees Employment Market Strength Assessment, Bilfinger GVA, 2015).
27. The lack of significant development in recent years has been an indication that the right opportunities for development do not currently exist, rather than market failure. This is clear when looking at employment sites that have come forward for development in the North of England. They are sites that meet the criteria set out above which simply haven’t been available within Kirklees. Such examples include:
- Kirklees J26 M62 Cleckheaton
 - Former BBA sites redeveloped as Access park Whitehall 26 and 26; 62.
 - In total four adjacent sites totaling approx. 35 Acres
 - Bradford J 26 M62 / M606 –
 - Prologis Park. 90 acres fully developed to deliver national DC for M & S.
 - Major facility for PB Foods and 9 SME units .
 - Calderdale/ Kirklees J24 M62
 - Lowfields Estate, Elland approx. 100 acres plus Lindley Moor approx. 15 Acres
 - Wakefield J 31 M62
 - Link 62 and Trident Park, approx. 80 acres plus
 - Europort approx. 90 Acres
 - Wakefield J 40 M1
 - Silkwood Park approx. 40 acres
 - Wakefield J 33 M62
 - Crosspoint approx. 60 acres
 - Rochdale J 21 M 62

- Kingsway approx. 420 acres

SECTION 4: SPECIAL CIRCUMSTANCES

28. The Allocations and Designations Local Plan document proposes to release a number of sites, including the site between Whitehall Road and Whitechapel Road, from the Green Belt, as these provide the only sites that can create the development opportunities described above.
29. This section of the report sets out the exceptional circumstances that justify the release of this site from Green Belt.
30. The Local Plan Spatial Strategy seeks to develop a strong and thriving economy reflecting the priorities identified in the Leeds City Region (LCR) Strategic Economic Plan (SEP) and the Kirklees Economic Strategy (KES) and joint Health and Wellbeing Strategy. The Local Plan aims to assist in the creation of new jobs, most obviously through the allocation of new prime land for employment uses. The Local Plan seeks to deliver 23,000 new jobs of the plan period to meet the objectively assessed jobs need. The Local Plan establishes that to deliver these jobs 167Ha of new employment land needs to be allocated.

Need and Market Demand

31. The Kirklees UDP was adopted in 1999 and identified land allocation for the period 1 April 1993 to 1 April 2006. The UDP was never subject to a formal review as it was intended to be replaced by the Kirklees Local Development Framework (LDF). Whilst progress with the LDF was limited the Council got so far as to publish a Core Strategy - Consultation Draft which set out the strategy for identifying employment sites over the Framework period. Work on the LDF was halted as the Council proceeded with the preparation of a new Local Plan. However, the broad strategic approach for new employment land has remained constant, with a desire to provide large new employment sites in close proximity to motorway junction, providing access to the national motorway network. It was believed these sites would be attractive to major employers, which is expanded upon further in this report below.
32. Notwithstanding the above, the delay in bringing forward an adopted development plan means there has been no new employment land allocated for nearly 25 years (1993 to present) and the current land supply, whilst not yet developed, was not intended to meet need from 2006 onwards, a period of nearly 12 years.
33. Furthermore, many of the employment sites within the UDP have remained undeveloped, which brings into question their suitability to attract developers and major employers, however there is a Market Demand for new premises.
34. Dove Haigh Philips has undertaken a market review to ascertain the demand for employment land in Kirklees District. It concludes that the market has reached a

point in the economic cycles where it no longer suffers from an over-supply of buildings or serviced sites.

35. The majority of the empty units which were built immediately before the recession in 2008-2012 have now been absorbed by an upsurge in demand. The market is now operating on the traditional route of “build to suit” or pre-let / pre-sale agreements, where developers provide buildings according to known occupier requirements. In order for the market to operate in this way, there needs to be a supply of available and deliverable sites which are suitable for strategic employment needs.
36. Banks and other property lenders remain cautious about lending on property (whether already built or for development), and as such only prime sites will be able to attract funding for future development. In future, only sites with the key attributes which appeal to occupiers will continue to attract interest from end users and it is likely that a two tier market will emerge, with secondary sites being unable to deliver appropriate accommodation for new high quality enquiries.
37. The site at Whitechapel Road is well-placed to compete with other favourable locations due to its excellent transport links, availability of an economic labour pool and perception of good value for leasehold and freehold property terms. Despite difficult market conditions over recent years, the area around Junction 26 of the M62 and south Bradford area around the M606 has continued to attract a number of key occupiers to the region.
38. Against a backdrop of difficult market conditions and a general reduction in occupier’s requirements, the area has performed well over the past 5 years. A number of key occupiers close by include;
 - M&S – 1,000,000 sq ft
 - PB Foods – developed their own premises on a 10 acre site
 - Various new occupiers in trade units to the southern side of Chain Bar
39. There are a number of current occupiers in the market with known requirements. There is also a potential demand from indigenous occupiers seeking accommodation suitable for expansion in Kirklees. There are no buildings or sites which can accommodate these requirements, even with existing market churn as existing vacant buildings are not suitable.
40. At present, a number of occupiers across West Yorkshire are seeking to relocate or expand in the region, although there is now a lack of available stock which is suitable for current tenant requirements. As a result of this, occupiers are renewing their leases on a flexible basis in order to allow relocation in the next 3-5 years when economic conditions are expected to be more positive and there is an availability of suitable stock. Consequently, there is a need for sites to be available which can quickly respond to meet this anticipated demand.

41. Based on recent market activity and the current market supply there will be activity in the sector in the short term, and occupiers will gravitate towards the sites which can deliver new buildings in a short timescale. Two sites in particular have good availability and Enterprise Zone status, at Lindley Moor (Summit Park) and Mirfield (Moor Park) which will meet some of this demand.
42. The following three (un-named) local occupiers have also asked to be kept informed of opportunities to acquire new accommodation on site, subject to planning.

“Company A” – A food manufacturer currently based within 5 miles of the site seeking a five acre site for new production facility.

“Company B” – A floor covering distributor with two smaller facilities seeking to consolidate onto a single larger facility.

“Company C” – An electronics distributor focussing on expansion into the online market with existing facilities in Kirklees and the Midlands.
43. There are a number of occupiers which have active requirements in the market and the existing supply of buildings to suit modern requirements is low. Some availability does remain although this is not a result of over-supply. In certain instances the accommodation on offer is compromised and is difficult to let or sell unless at eventual discounted terms. There have also been some buildings returned to the market due to business failure.
44. Market confidence exists from developers with the resources and experience to invest in up front enabling infrastructure services and site works to deliver occupier packages on a phased basis. A number of enquiries have also been secured from occupiers interested in substantial sectors of the proposed development if planning approval is granted.
45. The site is in a sustainable location with established infrastructure, and has the ability to deliver buildings suitable for current market requirements. There is current and likely future demand for space on this site in addition to the other sites which are already available and well known to the market.

SECTION 4: ASSESSMENT OF AVAILABLE SITES

46. Having established a demand for employment sites and identified the criteria that make sites attractive to the market, this report now examines the availability and suitability of sites that meet these criteria.
47. The Local Plan establishes a need to allocate 167Ha of employment land. The choices of where to accommodate this requirement are very limited due to topographical constraints around the districts. In order to meet the needs of occupiers, sites need to be close to motorway junctions; avoid congestion; have access to a workforce; have expansion opportunities; provide parking; and create an attractive environment.

48. This report reviews the available and proposed land supply, as well as other potential sites that have been submitted to the Council for consideration, but have not been proposed for allocation.
49. The draft Local Plan proposals map identifies key locations for larger strategic employment and mixed use sites in Kirklees. These are:

Site	Use	Draft Local Plan Allocation Reference	Hectares (Employment)	Status
Cooper Bridge Land north and west of the Three Nuns Pub and the former Cooper Bridge Waste Water Treatment Works, Leeds Road, Mirfield	Employment	E1832	46.83	Greenfield /Brownfield, Green Belt / Unallocated Urban land
Chidswell Land east of, 932-1110 Leeds Road, Shaw Cross/Woodkirk, Dewsbury	Mixed	MX1905	30 ¹	Greenfield, Green Belt
A58/M606 Land to the north and west of, The Royds, Whitechapel Road, Cleckheaton	Employment	E1831	24.57	Greenfield, Green Belt
North Bierley Former North Bierley Waste Water Treatment Works, Cliff Hollins Lane, Cleckheaton.	Employment	E1985	23.13	Brownfield / greenfield; Green Belt
Lindley Moor Land south of Lindley Moor Road, Lindley, Huddersfield	Mixed	MX1911	15.7	Greenfield, Employment Allocation
Slipper Lane Land at, Slipper Lane, Leeds Road, Mirfield	Mixed	MX1929	5.3	Greenfield, Employment Allocation
Clayton West <i>Land to the east of, Park Mill, Wakefield Road, Clayton West, Huddersfield</i>	<i>Employment</i>	<i>E2333a</i>	<i>16.82</i>	<i>Greenfield, Green Belt</i>
Total			162.35 (144.53 Excl. Clayton West)	

¹Calculated on the basis of 122,500sqm as per draft site allocation. Formula: sq m / 0.4 (to give 40% site density) / 10,000 = Ha

50. This total amount is not adequate to meet the entire identified need for the District. However, the table above only presents those sites which are identified as key strategic sites in close proximity to the motorway corridor. It is not the purpose of this statement to review the entire employment land supply, particularly the smaller existing allocated sites which are less likely to come forward or make a meaningful contribution to supply. The listed sites are close to the motorway network, would offer good potential for modern accommodation in an attractive setting and most are new, or relatively new, to the market.
51. The site at Clayton West has been omitted from the review as it aims to serve a different market to the other sites which are located in close proximity to the M62 corridor. The Clayton West site has been identified due to the links with Barnsley and Sheffield to the south, with a view to providing employment opportunities for the people in South Kirklees.
52. The land available around the motorway junctions has also been reviewed to determine whether there are other options which have equal or better potential to meet the identified need than the selected site, or indeed than the site of Whitehall Road.
53. Other potential sites have been identified at:
- Howden Clough Road, adjacent to Birstall Retail Park, J27 M62 (Site 1)
 - Whitehall Road West, Hunsworth J26 M62 (Site 2)
 - Bradford Road / Sykes Lane, Oakenshaw, J26 M62 (Site 3)
 - Oakenshaw Lane, Oakenshaw, J26 M62 (Site 4)
 - Brighouse Road, Ainley Top, J24 M62 (Site 5)
 - Land to the rear of New Hey Road, Mount, J23 M62 (Site 6)
54. Each of these sites is greenfield and within the Green Belt. The existing and proposed employment land supply sites are reviewed further below.

Extant Permissions

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

Slipper Lane, Mirfield

57. This site is a UDP employment allocation (ref B9.2). It has therefore been allocated for a considerable period of time and is not a new prospect for the market.
58. The site secured outline planning permission in 2014 (reference 2014/90688). The permission provided for a mix of housing (166 homes) and employment uses (17,233 sq m/185,500 sq ft). The draft allocation provides for 21,382 sq m (230,254sqft) of employment uses.
59. As one of the UDP allocations, the site has a significant planning history. In 2008, permission was secured for a Care Village and B1/B2 uses. A second application for B2/B8 uses was approved in 2012, for a sub-regionally based gearing business. The care village/employment development permission was renewed in 2013. The site has a history of non-delivery of permissions over the last 8 years, although the current permission requires the housing development to cross subsidise infrastructure works to help bring forward the employment development.
60. The current outline permission includes the approval of access into the site, but a planning application relating to other reserved matters has yet to be submitted. The planning approval is subject to a S.106 agreement that requires delivery of the site access, earth works to level the site, site remediation and servicing to development plots to be delivered on the employment land before construction of the first house commences.
61. The S.106 agreement will improve the marketability of the employment site. There is currently interest from a developer looking to develop the site with a specific occupier looking to take one of the units on the site. This site is therefore likely to cater for some of the latent demand for employment land. However, in terms of scale, the site is limited (17,234 sq m) with the size of units available also constrained. The illustrative master plan that accompanied the outline planning application shows a range of smaller units, the largest being 4,646 sq m, although there is potential for a larger unit on the site. The site will meet the need for some smaller businesses, start-ups and businesses looking for a better quality buildings or an improved environment.
62. The mixed use nature of the site has secured the infrastructure for the employment uses on the site. As such it is likely to provide a short term supply of premises to meet immediate needs, at the smaller end of the market.
63. There remains a need for short and medium term opportunities for larger buildings marketed at already successful and growing businesses.

Lindley Moor

64. This site is also a UDP employment allocation (ref B9.2) and has also been allocated for a considerable period of time and is not a new prospect for the market.
65. Part of the UDP allocation B8.1 (which is largely the same as proposed allocation MX1911 in the emerging Local Plan) secured planning permission in 2015. The permission was in outline for 19,510 sq m of employment development. Full permission was also sought for 252 dwellings. The scheme was subject to a S106 agreement which would secure access improvements, highways works, diversion of pylons, drainage works and cut and fill of the employment land. The inclusion of housing on the employment land was justified on the basis of higher value uses being needed to deliver the employment development.
66. The illustrative master plan that accompanied the planning application shows 2/3 units, one of 4,645sqm and the other(s) at 9,290 sq m + 5,574 sq m or a combined 14,864 sq m unit.
67. This site also benefits from permission and commitments to deliver infrastructure works. As such, it is likely to provide a short term supply for immediate needs, at the small and medium end of the market. However, based on the illustrative master plan, the site is only capable of supporting one larger building, which is a very limited supply given the weight attached to growth in advanced manufacturing and the need for large releases of land for intensive logistics developments.
68. A proportion of the allocated site, to the east, is not included with this planning permission. It is likely that this area has been excluded as it presented challenges, either from a technical or landowner perspective. If this part of the site was capable of development to meet employment needs, it is highly likely that it would have been included within the current scheme. However it remains an allocated site that has not come forward for development for nearly 17 years. Whilst it remains an area of land that should be pursued for employment development, it is not likely to deliver in the short term.

Committed sites pipeline

69. The review of the Slipper Lane and Lindley Moor sites above shows that there is a committed supply of land which is broadly capable of meeting immediate needs.
70. However, a review of the pipeline of recently approved sites which meet the relevant site selection criteria set in the draft Local Plan technical paper suggests that on the basis of average take up, these consents will provide only a fraction of the land needed to ensure a steady supply of good quality employment land to the market.

71. The Local Plan technical paper notes² that 10ha of land has been taken up on average every year since 2004-5. This is a “policy off” average, which reflects the average performance of the market over a 10 year period. Notably, at least 8 years of the monitoring period of 2004-2014 was after 2006, which is the end point of the UDP’s planned land supply.
72. A 10ha take up represents a development footprint for this type of development³ of some 40,000sqm (430,556sqft). These two sites have consent for a total of 36,742sqm (395,487sqft) of space. These sites therefore represent only 91% of a single year’s supply.
73. However, this calculation represents take up in a “policy off” scenario and notably covers a period when the supply of prime sites has been significantly limited, thus limiting the potential for take up through supply constraint. These factors in turn would significantly decrease the percentage supply these sites offer.
74. To illustrate this, the emerging Local Plan covers the period 2013 to 2031 (18 years) and proposes to allocate 216ha. On an annualised basis, this equates to 12ha per annum. These sites would therefore only equate⁴ to 76% of a year’s supply in the “policy on” scenario.
75. The emerging plan runs from 2013, which is now 4 years ago. 8ha of land was taken up in the 2013-14 monitoring period⁵. Monitoring figures for 2014-15 are not in the technical paper, but it is clear that there is already a shortfall against the plan period delivery.
76. The Local Plan is not likely to be adopted until late 2018. This is 5 years after the plan start date meaning that some 58ha of land needs to be released and developed to simply keep pace with the average annual rate for the plan period up to adoption.
77. Clearly, this will average out when larger sites are released when the plan is adopted, although it does suggest that in order to avoid a future shortfall, which would damage economic progress and realisation of the plan’s objectives, it is necessary to consider releasing some additional land in the short term and before the plan is adopted.
78. It also suggests that two sites, which have struggled to deliver, which amount to two-thirds of a year’s supply, is far from adequate to meet the needs of the District’s primary opportunity for economic growth.
79. Furthermore, this analysis is set in the context of there being no employment land allocated in Kirklees since 1999.

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

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

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

⁵ Table 3 para 6.3 Local Plan Technical Paper.

80. In addition, the sites currently proposed for allocation also have a lead time to deliver development, which needs to be taken into account in delivering a pipeline of sites which can meet market needs.
81. The committed development sites are not adequate to meet the needs of the advanced manufacturing/logistics sector in the run up to the adoption of the plan. There remains a need to secure further opportunities which can begin addressing constraints before the plan is able to formally allocate sites

Primary Employment Area Sites

82. These sites are existing employment areas which are either largely or completely developed out.
83. As such, they present a limited opportunity for new land to be developed. Many of the sites do offer potential for small new buildings, or small scale expansion of firms adjacent to gap sites within the PEA and so will form a part of the overall supply. However, many do not share the locational advantages of the potential new sites in the area and most are highly constrained. They are also well known to the market and opportunities haven't been taken up for the reasons set out.
84. Taking several examples of PEAs close to the motorway corridors as examples:
 - Site B&S3 (Oakwell Industrial Park, Centre 27 Birstall, 63.41ha) is proximate to the M62 / M621 and has a vacant site with potential for a separate access onto an estate road. However, it is at the rear of the park and is some 2.3ha in size. At 40% site density it could accommodate a unit of roughly 100,000sqft (around 10,000sqm), although it is triangular in shape which would limit site efficiencies considerably, meaning that a smaller unit would only be achieved in reality. This is an example of a good available site, in a modern context within the PEA. It could feasibly serve local expansion needs but its contribution would be limited and in line with the normal performance of the employment market in Kirklees. It has been on the market for some time.
 - Site B&S11 (West 26 / Stubs Beck Lane, Cleckheaton, 11.56ha) is in an excellent and high profile location, at the junction of the M62 and M606, on relatively flat land with good access to markets and a labour force. This would meet the locational requirements set out in the agent's survey undertaken as part of the local plan evidence base. However, there is currently no accessible land within the PEA boundary which could accommodate new development. There is landscaping and scrubland between the built development and the motorway junction roundabout which could feasibly accommodate additional development, but it would need to be accessed through either existing development or directly off a busy roundabout with a sub-optimal access arrangement (e.g. a left in / left out only access). This land has also been visible to the market for some time
 - Site HUD5 (Mamas & Papas, Colne Bridge, Leeds Road, 6.25ha) is in a good location, just off Leeds Road with good access to the M62 via Cooper Bridge.

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

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

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

86. In summary, we consider that the PEAs are:

- (i) Not a reliable source of supply. Many are constrained, small and in remnant locations within the wider sites following development of the better parcels of land;
- (ii) Most suited to the expansion of existing businesses, particularly those within the PEA already. Some are so constrained that they can only meet a direct extension need, whilst others may be suited to smaller businesses in new units, but are still fundamentally constrained sites even within the better located PEAs;
- (iii) Offer nothing new to the market. These are not new employment sites. They have been available to the market for a considerable period of time. Their lack of development suggests that whilst they theoretically exist as supply, they are not likely to be taken up quickly or enthusiastically by the latent demand identified in the evidence base. If they were attractive to that demand, they would have been taken already;

- (iv) Unlikely to help drive the economic change sought by the Council's Economic Strategy. For the reasons set out above, the PEAs will not meet the need for new, strategically located and good quality sites identified as what is needed in order to drive Kirklees' economy forward. The market needs fresh top quality sites, rather than a theoretical supply based on old sites which may be suitable for employment use, but which are not the best available to meet modern requirements. The need for new strategic sites is consistent with the evidence base, and an initial analysis of several opportunity sites in the PEAs supports this view.

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

Draft Local Plan Strategic Sites

88. In order to meet the identified need, the draft local plan identifies several new strategically located employment sites. These include sites at Cooper Bridge (46ha, site E1832) and Chidswell (117ha, providing 1.3msqft of employment as well as 1,535 homes, MX1905). The Leeds City Region Strategic Economic Plan (SEP) identifies both these sites as being strategic employment growth opportunities. Their proximity to the motorway is key, meaning both sites have the potential to support growth in manufacturing and engineering sectors.

Cooper Bridge

89. The employment site at Cooper Bridge (46ha) is a very well-located site with good access to the motorway and in the right area to benefit from proximity to businesses serving the South Calderdale – North Kirklees - South Bradford manufacturing arc. It is well placed to serve the needs of businesses which are expanding or new start-ups in the areas priority sector. It has the potential to provide exactly the kind of accommodation noted as being required, namely new premises in close proximity to the motorway and workforce, in a high quality environment and with little congestion. This site would clearly help to meet the need identified in the supporting evidence.

90. Cooper Bridge is also likely to provide accommodation for precision engineering and advanced manufacturing, as well as logistics and distribution buildings which are related to this key growth sector. It will also be attractive to more general Use Class B8 provision, given the lack of larger flat sites at this end of the West Yorkshire conurbation.

91. These distribution uses are less dense and will therefore require more land within the overall allocation. However, such support uses are critical to the success of a well-functioning cluster of engineering and manufacturing activity. Successful businesses require efficient logistics to secure components, consolidate and assemble components and export them to the end user. Without such support the businesses in the cluster will be less efficient and therefore less attractive.

92. The site is well-contained by recognisable features and topography, and has the potential for boundaries to be further strengthened without impacting on site capacity due to wider land ownership. The release of the site will not result in the erosion of a strategic gap in the Green Belt and will not lead to the unconstrained sprawl of development in the countryside by virtue of its boundary features. The release of this land would not undermine the functioning of the wider Green Belt and, in the context of the identified need, we consider this to be a justified release of land.
93. Cooper Bridge also has constraints. It is partially previously developed, but is largely greenfield and requires highways improvements to be undertaken using, in part, public funding sources. Whilst this site is recognised as being sub-regionally important, it is likely to have a reasonable lead-in time to development.
94. In our view, whilst it is an important site in the context of the plan, in terms of its ability to meet an immediate employment need we consider that it is not likely to deliver a meaningful supply of land in the next 1-5 years, but could provide an essential component of new attractive land with additional local transportation benefits.

Chidswell

95. The site at Chidswell is a major strategic release of 117ha. However, the majority of the site will focus on delivering housing development. The plan envisages around 122,500 sq m (1.3m sq ft) of employment floorspace.
96. This site is relatively well-contained by existing development and well-defined field boundaries/woodland blocks. It is entirely greenfield. It does represent a large release of land and thus will inevitably change the settlement pattern and reduce the separation distance between Chidswell and Tingley. However, it will not result in coalescence or unnecessary sprawl into the countryside, in the context of the identified need for housing and employment land. The release of this land would not undermine the functioning of the wider Green Belt and, in the context of the identified need, we consider this to be a justified release of land.
97. The emerging plan notes that third party land is required to deliver access. Aerial photography reveals that the eastern and northern edges of the site, which would offer the best accessibility to the motorway (M62, J28 at Tingley) are lined with residential properties. This will be a constraint not only for access, but also on whereabouts in the site the employment development will be best located. Protecting existing residential amenity, whilst avoiding creating amenity impacts for new residents on the site and placing the employment uses in the most accessible position within the site, will be a difficult balance to achieve on this site.
98. As the site has a focus on housing, which will provide better returns and help to fund the wider infrastructure needed on the site, this may have the effect of delaying implementation of the employment areas. Whilst recognising the importance of this site for the plan period, we consider that it is also likely to have a reasonable lead time before development can take place. On this basis, we

consider that it is unlikely to deliver meaningful employment space in the next 1-5 years.

Strategic Sites Overview

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

Draft Local Plan: Proposed Allocations

100. There are also two employment allocations proposed for allocation in the draft Plan. These are at land at the A58/M606, Cleckheaton (24ha, Site E1831) and North Bierley (23ha, Site E1985).

A58/M606, Cleckheaton

101. This site is located just off the M62/M606 junction and, as such, is in an excellent location, which will be extremely attractive to the market. It is also accessible to a strong workforce in Kirklees, Bradford and Calderdale. This site is greenfield and whilst it is 24.5ha, an area is affected by a high pressure gas pipeline, so the developable area has been estimated in the plan at 11.72ha.
102. This site has a number of lower level constraints which appear to be capable of resolution. It is a high performing site in terms of the land requirement criteria and is a suitable option for release for development.
103. The site is well contained by the A58, M606 and existing development, albeit that development remains in the Green Belt. Its development will reduce separation distances between Cleckheaton and Scholes, but it will not result in their coalescence or unnecessary sprawl into the countryside. The release of this land would not undermine the functioning of the wider Green Belt and, in the context of the identified need, we consider this to be a justified release of land.
104. Whilst the site is not identified with the Leeds City Region SEP as being a strategic employment growth opportunity, the proximity to the Motorway network means the site benefits from the same characteristics and Kirklees Council is now attributing the same level of importance to this site as the two identified Strategic employment sites.

North Bierley

105. This site is the subject of a current planning application which is due to be determined in the early part of this year. The proposed development focuses on employment provision and the site is very well located for access to J26 of the M62 and the M606.

106. This site has a number of lower level constraints which the planning application has demonstrated to be capable of resolution. It is a high performing site in terms of the land requirement criteria and is a suitable option for release for development.

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

Other Potential Sites not selected for allocation

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



108. This site is approximately 17ha and is bounded by the existing Centre 27 Business Park, Norquest Business Park, Howden Clough Industrial Estate and a watercourse. It is greenfield and occupies the gap between this established industrial area and the Kirklees boundary. It is well-contained on all sides and would not reduce distances between settlements or result in future pressure to extend into the Green Belt around the site.

109. However, the site slopes steeply, is largely wooded and is crossed by overhead pylons. Access to the motorway would need to be achieved through the existing Industrial Estate, via Nab Lane, Pheasant Drive and the A62.

110. It is our view that this site is not considered to be a suitable release at this time, as the topography would offer a major barrier to development.

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



111. This site is bounded by the M62, Whitehall Road West, woodland and existing housing areas off Hunsworth Lane. It is greenfield and approximately 19ha. It is sloping agricultural land with well-established and treed field boundaries at its southern end close to Whitehall Road West. To avoid taking access through a residential area, access would be needed directly off the A58.

112. The site would not result in a loss of separation distance between settlements and is relatively well contained by recognisable features on the ground.

113. However, the site is adjacent to approximately 74 houses on its western edge and, whilst the A58 is a major highway, traffic from the site would need to pass through Hunsworth to access the motorways. This is not considered to be ideal, especially given the existence of other sites without such a constraint.

114. This site is not considered to be suitable for release at this time.

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



115. This site is approximately 16ha and is bounded by a disused railway embankment, houses on Bradford Road, houses on Sykes Lane and the Cleckheaton Golf Club. It is greenfield, relatively flat and well contained by existing features. It is crossed by overhead pylons.
116. Access would need to be taken either from Sykes Lane, which is narrow and shared by several dwellings, or directly from Bradford Road, close to Woodlands Park (a small office complex).
117. The site is adjacent to around 40 homes and, as such, we consider this has the potential to cause more amenity issues than other equally well located sites.

Oakenshaw Lane, Oakenshaw, J26 M62 (Site 4)



118. This site is also approximately 16ha and located immediately adjacent to site 3 above. It is greenfield and bounded by the disused railway, Oakenshaw Lane and the Cleckheaton Golf Club. It is crossed by overhead pylons. It is well contained by recognisable features and would not significantly reduce the separation between settlements in the area.

119. Access would need to be taken from Oakenshaw Lane. At its north, the Lane is shared with a farm, and crosses the railway cutting in a narrow cobbled bridge which is unlikely to be suitable for commercial traffic. At its south the lane is a dirt track directly accessing the A58. It would require major upgrading works to be used as an access point for commercial traffic and this would involve acquiring additional land along a considerable length of the Lane.

120. Achieving a suitable access to this site would be extremely difficult.

Brighouse Road, Ainley Top, J 24 M62 (Site 5)



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

Land to the rear of New Hey Road, Mount, J23 M63 (Site 6)



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

SECTION 5: CONCLUSIONS

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

meet needs until the plan is adopted and during the early stages of the plan period when other more complicated sites are seeking permission and undertaking enabling works. There is clearly a need to release more land in order to ensure that the economic objectives of the emerging plan, Kirklees and City Region Economic Plans, are not undermined by a lack of delivery during the plan's early stages. The identified allocations offer the best options to achieve this, and as noted above, without these allocations in place, the plan will have an inadequate supply of employment land.