

# **CLIVE BROOK PLANNING**

## **KIRKLEES LOCAL PLAN EXAMINATION IN PUBLIC**

**STAGE 4 HEARINGS- BATLEY & SPEN SUB AREA**

**THE LOCATION AND SITE SPECIFIC CASE FOR AN EMPLOYMENT  
ALLOCATION ON LAND TO THE WEST OF BRADFORD ROAD  
OAKENSHAW ON BEHALF OF SCHOFIELD & PASK SITE REF E2700**

**EVIDENCE BY CLIVE A BROOK BA, FRTPI**

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STAGE 4 HEARINGS -BATLEY AND SPEN AREA

EVIDENCE OF CLIVE A BROOK ON BEHALF OF SCHOFIELD & PASK SEEKING AN EMPLOYMENT ALLOCATION FOR SITE E2700 -LAND TO THE WEST OF BRADFORD RD OAKENSHAW

## 1. INTRODUCTION AND BACKGROUND

1.1 This statement of evidence comprises the strategic, economic and policy arguments in support of this employment allocation proposal plus the site specific case. There are therefore a number of arguments at national, city region, local and site specific levels which support the allocation case. This statement of evidence weaves together the many strands of the allocation case.

1.2 The contents of our client's submission to the consultation on the Publication Draft Kirklees Local Plan comprised the following documents:-

- Site Advocacy Brochure- produced by Johnson Brook (January 2016)
- Stage 1 Ground Investigation and Drainage and Flood Risk assessments by Jordan Pritchard Gorman.
- Noise Assessment Report by Environmental Noise Solutions
- Transport Appraisal by Sanderson Associates
- Air Quality Appraisal- Waterman Infrastructure & Environment

These reports were commissioned to specifically address particular issues raised by Kirklees officers in their sustainability assessment of the employment allocation proposal. All of these reports were produced at the beginning of 2016. The formal objection to the rejection of site E2700 as an allocation is contained in a short cover report prepared by Johnson Mowat (the successor company to Johnson Brook).

1.3 The site covers a gross area of 11.2 hectares with an assessed net area of 7.3 hectares (18 acres). Using a 35% buildings coverage per net developable acre the total built floorspace will be circa 25,900 sq.m . A fundamental consideration when examining the case for this employment allocation is the specific nature of the proposal which is a medium sized B1 business park restricted predominantly to office and research and development space. This proposal will serve the existing industrial and distribution market and the future advanced manufacturing industry to be located along the M606 and M62 motorway corridors. Typical examples of the envisaged tenants include companies involved in servicing office equipment ( computers, photocopiers etc), IT and management consultancies, financial services, design, and contracted out R&D services. There are few examples in the wider locality of this type of medium sized business park, one at Gildersome in the Leeds part of the M62 corridor and another being off Junction 41 of the M1 in Wakefield District. The space occupied by buildings together with good landscaping and circulation will provide a high quality business park which meets the standards and aspirations required by 21<sup>st</sup> century business as required by national and local policies.

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- 1.4 I and my colleagues at Dacres Commercial are not aware of any comparable proposals within North Kirklees or the adjacent parts of South Bradford to serve the substantial concentrations of industry located at the heart of the West Yorkshire conurbation within the M62 and M606 corridors.

## **2.0 LOCATION AND SYNOPSIS OF STRATEGIC CASE**

- 2.1 I have reviewed national , sub regional and local policy, both planning and economic policy approaches, which support the development of quality modern industrial and business sites. The NPPF(March 2012) supports the provision of sufficient land and development of the right type, in the right places and at the right time to support growth and innovation (para 7 first bullet point), taking account of the needs of the business community (para17, third bullet point), and planning proactively to support an economy fit for the 21<sup>st</sup> century. Paragraphs 160 and 161 of the Plan-Making part of the NPPF require LPA's to work closely with the business community to identify their changing needs including qualitative needs for all foreseeable types of economic activity. The Council have not adequately demonstrated that they are providing a suitable range of development types.
- 2.2 Site E2700 and the sections of the M62 and the M606 are located at the heart of the West Yorkshire conurbation and the LCR. This location provides the site with the following key characteristics:-
- Excellent motorway connections
  - A large skilled labour force within short travel distances
  - The potential to create stronger linkages between industries and their supply and service chains.
  - This core area does not exhibit the topographical, flood risk and other major environmental constraints which affect large parts of the conurbation.

This site and a very limited number of other potential sites in this locality represent rare opportunities to create much needed quality employment sites for 21<sup>st</sup> century commerce. The economic strategies of the Leeds City Region (LCR) and Kirklees recognize the importance of this area. Site E2700 has the additional benefit of easy access to sustainable travel modes which is a key consideration when assessing traffic impacts of development on motorway junctions.

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- 2.4 LCR STRATEGIC ECONOMIC PLAN (2016-2036) (MAY 2016):- This plan has four key priorities the first two of which are to grow business and achieve skilled people and better jobs. North Kirklees is identified as a regeneration priority area. Oakenshaw lies in between Bradford and Huddersfield both of which are identified in this Plan as Strategic Growth Centres.
- 2.5 KIRKLEES ECONOMIC STRATEGY – (JUNE 2014):- Five priorities are identified to deliver the strategic vision. The first is to deliver precision engineering and innovative manufacturing. Weaknesses and threats to this priority include a limited land supply. A number of actions are identified for this priority including:- “Lead on innovative manufacturing in LCR and take forward the M62 manufacturing hub concept linked to supply chains, inward investment, exports and innovation.” The E2700 business park proposal will specifically help to deliver these key supply chain and innovation linkages.
- 2.6 THE DRAFT KIRKLEES LOCAL PLAN:- Under the Inspector’s Matter 2 – Spatial Development Strategy- the Inspector posed the following question :- “does the Plan’s Vision and Place Shaping chapter provide a clear framework for the future growth and development of different sub areas of the borough?” In my response I referred to the Issues scheduled in the earlier section of the draft Plan. Issue 12 states “ how should the relative economic strength of Kirklees and its inclusion within the LCR and part of the Northern Powerhouse be taken into account in determining where and how development needs are to be met.” The introductory response in the Plan states that the opportunity exists to transform the economy in the northern parts of the District with the strong links to Leeds/ Bradford both geographically and in terms of proximity to the M62 and linking motorways. The E2700 business park proposal is a key cog in the economic transformation strategy set out in the array of documents including the Northern Powerhouse Plan, the LCR and Kirklees Economic Strategies and the draft Local Plan. The NPPF policies back this growth, innovation and quality site delivery.
- 2.7 BRADFORD – KIRKLEES LINKAGES AND CO-OPERATION  
The area of North Kirklees and particularly the section to the north of the M62 corridor has very strong socio -economic linkages with Bradford District and in particular south Bradford. These strong relationships are recognized in the Andy Haigh Assocs report - Strategic Employment Land Review for the LCR and WYCA -final report Oct 2016 (CR2) and in the LCR/WYCA Statement of Co-operation for local planning (CR 17). Commuting patterns and changes from 2001 to 2011 referenced and mapped in the CR2 report demonstrate this linkage. The M606 and other north-to south transport features including Bradford Road, the two main bus services and the Sustrans cycle route 66 are some of the unifying features along this corridor. Bus services 268 (Dewsbury to Bradford) and 268A (Wakefield to Bradford) have stops near to the proposed site

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entrance with frequencies of 20 and 10 minutes respectively. The settlement of Oakenshaw to which site E2700 is most closely linked is predominantly within Bradford District.

2.8 I presented evidence under Matter 1 -Duty to Co-operate, with regard to close and continuing joint working on employment land supply matters across the Bradford/Kirklees administrative boundary. I have subsequently carried out further work as part of Bradford Property Forum's team who are currently examining this land shortage issue. There are deep concerns expressed by businesses and professionals within the Chamber of Commerce (the Property Forum is a sub group of the Chamber) regarding this issue. Bradford Council have not produced an up to date Employment Land Availability Survey. The last survey was in 2011 . The NPPF requires that such evidence base surveys for plan-making should not be more than three years old. The 2011 report concluded that the remaining supply of employment land in Bradford (107 hectares at this point) "was not entirely suitable for modern economic development requirements – as many sites are too small, have difficult physical constraints or are located in those parts of the District where there is little demand for employment uses. The report also stated that "ongoing work is needed to ensure well -located serviced sites are coming to the market on a regular basis."

2.9 The 2011 report envisaged that future economic development in Bradford District would be focused in the main urban area of Bradford, "especially the south", in Airedale and in proximity to the Principal towns of Ilkley and Keighley. The latest annual monitoring report for the Bradford LDF (July 2017) covers the year 2014/15. This states that 96.9 hectares of employment land was available but that the supply is made up of many small, constrained and poorly located sites. There is no up to date qualitative analysis of this land supply which is why the Property Forum are actively addressing this matter. Work to date reveals that well over 50 % of this supply does not meet modern requirements. Indeed the team envisage that their ongoing qualitative assessment and application of the NPPF suitability criterion for old employment sites will reduce the suitable supply to significantly below 30 hectares. The new supply requirement to 2030 contained in the adopted Core Strategy is "at least 135 hectares". The proposed distribution of this supply in the Bradford CS (policy EC3) is 100 hectares to the City of Bradford, 30 hectares to Airedale and 5 hectares to Wharfedale. The great majority of this 135 hectares and more will have to be found on new sites due to the problems associated with the current supply. Of the 100 hectares to be found in the City of Bradford the majority will be in south Bradford in the M606 corridor. An examination of existing industrial estates in the corridor in south Bradford helps to demonstrate the shortage of opportunities for new sites and the compelling case for some of Bradford's supply to be located in North Kirklees. The Property Forum's report should be available

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by the time of the hearings with further detailed evidence available to support this key argument.

### **3.0 KIRKLEES SITE ASSESSMENT OF E2700 LEADING TO ITS REJECTION AS A PROPOSED ALLOCATION**

3.1 Page 38 of the rejected site options report summarises the main reasons for the rejection of this site as an allocation (see Appendix 1\_). These can be summarized as follows:-

1. There are no exceptional circumstances for the release of this additional employment site proposal from the Green Belt and the Council consider that there are better alternatives.
2. The southern extent of the proposed allocation “would significantly undermine the strategic role of the Green Belt”
3. The consultation response from Highways England (HA) is relied upon and confirms potential impact on the strategic road network (SRN) and further mitigation would be required.

3.2 I conclude that there are exceptional circumstances for the release of this site from the Green Belt. In summary these are as follows:-

- Further evaluation of the employment land supply at this Examination via the MIQ’s at Matters 26 and 38 will assist in demonstrating that the 265 hectares gross supply proposed is a necessary requirement. Following deductions in the gross area for on- site constraints, on site infrastructure, relationships with housing on mixed use sites and adequate master planning the actual available gross and net developable areas which are deliverable will be reduced. This supports this additional site provision.
- The specific proposal for a dedicated business park targeted at a necessary range of support services for existing and future employment development in the M606/M62 corridors has not been considered by the Council (via requested meetings). This is a necessary economic requirement to support the Local Plan policies and the economic strategies of the LCR, Kirklees and Bradford. It is also supported by the NPPF policies requiring 21<sup>st</sup> century quality sites. There is no other specific proposal of this type in North Kirklees or South Bradford.
- The existing Bradford employment land supply position and the future land requirement in the CS are a further strong exceptional circumstance.
- The site performs very well on Green Belt and sustainability assessment criteria and in combination with its special B1 support services accommodation results

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in a deliverable net land contribution which is in certain respects preferable to selected allocations.

- 3.3 The Council's arguments in relation to the alleged Green Belt impact on the gap between Oakenshaw and Cleckheaton are highly contradictory and have been inconsistently applied. The impact of the selected North Bierley WWTW allocation is as great or greater in terms of this specific Green Belt impact. The westward containment of site E2700 and its north-south alignment with existing development and infrastructure, along and including Bradford Road, does not represent a more southerly extension than existing development. If the North Bierley site is allocated the settlement gap up to the substantial infrastructure of the Chain Bar motorway junction (see plans at Appendix 3).

The Council's rejection statement produces opposed green and red ratings for Green Belt function and edge assessments. The key sentences for comparison in the Green Belt edge rating are the ones that state "the extent of the strategic gap and the existing settlement pattern and landform features to the south of Oakenshaw present opportunities for rounding off without compromising the role of the Green Belt in this location. The area to the west of Bradford Road has only limited relationship to its wider setting and is contained by the route of the Spen Valley Greenway which would prevent sprawl." I agree with this wording which completely contradicts and undermines the wording used in the above paragraph on the Green Belt function. To the south of the extension which would be created by the E2700 development Cleckheaton Golf Course provides a gap which in combination with fields to the immediate north and south of the M62 maintains a reduced settlement gap. This is not the case with the development of the WWTW site which would link development from Oakenshaw to the industrial and residential development immediately to the south of the M62.

- 3.4 The HA consultation response has applied to all potential employment allocations in the locality of the Chain Bar motorway junction. As with all other selected allocations this development can provide the necessary mitigation in combination with other allocations. Site E2700 has however superior sustainable transport connections. Consequently the HA response does not constitute a reason for rejecting the allocation of E2700. The Green Belt argument provided by the Council does not stand up to scrutiny whether the allocation of site E2700 is considered on its own or in tandem with the North Bierley site.

#### **4.0 PRE EIP DISCUSSIONS AND CORRESPONDENCE**

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4.1 Council officers in discussions and in e-mail correspondence between the 21<sup>st</sup> March 2017 and 31<sup>st</sup> March ( see Appendix 2) were invited to consider a number of points which I then argued may justify an allocation. I sought a meeting to further discuss these and related matters. The officer response is contained in James Barker's e-mail of the 30<sup>th</sup> March which advises that "in the immediate term the best forum to discuss and hopefully address the issues raised would now be through the EIP process." Helpfully he goes on to state :- "We are however open to further dialogue as the EIP progresses at a later stage should that be appropriate course of action at the time. I and my clients are still keen to have such discussions with officers.

#### **5.0 THE SITE SPECIFIC CASE**

5.1 The material planning considerations making up the site specific case are well documented in sections 6 to 10 of the Johnson Brook Site advocacy brochure. As a result of the topic reports referred to in paragraph 1.2 of this statement some changes have been made by the Council but further positive changes are merited.

#### **6.0 SUMMARY OF THE CASE**

6.1 This is a well contained and relatively unconstrained and sustainable site which can be developed without closing the green belt gap between Oakenshaw and Cleckheaton. It is a much needed quality business park proposal which is justified in terms of economic and planning policy tests at the national, regional, city-region and local level. The omission of site E2700 is unsound as it is not justified on the basis of the evidence produced. The lack of provision of this quality business park dedicated to essential companies serving existing \and future businesses would be inconsistent with national, regional, city region and local policies. The omission is ineffective as it does not take account of cross boundary strategic priorities and not positively prepared in that unmet requirements from a neighboring authority will not be met.

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| E2700   | Site is in Green belt | Y | Green/Brownfield | G | Settlement Position   | E | Gross Area (Ha) | 14.96   |
|---|-----------------------|---|------------------|---|-----------------------|---|-----------------|---|
| <b>Land east and to the rear of, Syke Lane Bradford Road, Oakenshaw</b> |                       |   |                  |   |                       |   |                 |   |
|   |                       |   |                  |   | Employment Floorspace |   | 52,360          | Housing Capacity  |
| Transport   |                       |   |                  |   |                       |   |                 | Highways England confirm there is potential for impact on the SRN. Some committed mitigation schemes underway but further mitigation would be required. AWAITING DM HIGHWAYS COMMENTS.  |
| Public Health   |                       |   |                  |   |                       |   |                 | Obesity, physical activity, respiratory and isolated/lonely issues in the area. Potential need for mitigation.  |
| Education   |                       |   |                  |   |                       |   |                 | N/A   |
| Historic Env  |                       |   |                  |   |                       |   |                 | No objection but not far from PRN4203 - recommend predetermination archaeological evaluation. No impact on listed buildings or conservation areas.  |
| Flood/drainage  |                       |   |                  |   |                       |   |                 | The site lies in flood zone 1. The FRA states that surface water discharge will be attenuated to greenfield rates & soak away testing is required.  |
| Env Protection  |                       |   |                  |   |                       |   |                 | Emissions from the site will have an adverse impact on air quality within the area and Kirklees district. Full assessments and mitigation will need to be conducted at the planning stage. The noise report indicates that the site will be used only for A1 and B1 use. At the full application stage, a detailed noise assessment will be required to ensure that the amenity of existing residents is protected, for example if air conditioning units are going to be installed, or to consider the opening times of the retail outlet to ensure it is appropriate. If the employment use was other than B1 and A1 there are greater concerns about the potential loss of amenity to existing residents and the potential for noise generated by the site.            |
| Biodiversity  |                       |   |                  |   |                       |   |                 | No constraints  |
| Other constraints   |                       |   |                  |   |                       |   |                 | Part or all of the site lies within a high risk coal referral area.   |
| Open space  |                       |   |                  |   |                       |   |                 | N/A   |
| Green belt  |                       |   |                  |   |                       |   |                 | The location and configuration of this site means that it would be wholly contained east of the greenway and therefore there would be little risk of sprawl to the west. The greenway would form the new green belt boundary. However, the southern extent of the site would significantly undermine the strategic role of the green belt in preventing the merger of Oakenshaw with Cleckheaton. The green belt overwashes the lower density ribbon development and the industrial park to the west of Bradford Road in order to prevent the intensification of built form and to prevent any depth of development to the west and so maintain the appearance of separation which would be lost should the option be accepted.   |
| Green belt edge   |                       |   |                  |   |                       |   |                 | One of the purposes of the green belt is to prevent the merger of towns and this area of green belt performs an important role in preventing the merger of Oakenshaw with Cleckheaton. The administrative boundary between Kirklees and Bradford bisects Oakenshaw so it is acknowledged that west of Bradford Road Kirklees and Bradford are already joined. The extent of the strategic gap and the existing settlement pattern and landform features to the south of Oakenshaw present opportunities for rounding off without compromising the role of the green belt in this location. The area to the west of Bradford Road has only limited relationship to its wider setting and is contained by the route of the Spen Valley Greenway which would prevent sprawl. |

Exceptional Circumstances There are no exceptional circumstances to justify the removal of this site or any part of this site from the green belt.

#### Conclusion

Highways England confirm there is potential for impact on the SRN. Some committed mitigation schemes underway but further mitigation would be required. The southern extent of the site would significantly undermine the strategic role of the green belt in preventing the merger of Oakenshaw with Cleckheaton. The green belt overwashes the lower density ribbon development and the industrial park to the west of Bradford Road in order to prevent the intensification of built form and to prevent any depth of development to the west and so maintain the appearance of separation which would be lost should the option be accepted.

Alternative green belt employment options have been assessed in this area and are considered better alternatives. Sufficient land has been identified to meet the needs of industry therefore exception circumstances cannot be demonstrated for the release of land in the green belt at this location. Option rejected.

APP2

**From:** Clive Brook  
**Sent:** 31 March 2017 17:24  
**To:** James Barker  
**Cc:** Richard Hollinson; duncanpask@yahoo.co.uk; jji@dacres.co.uk  
**Subject:** RE: LAND TO THE EAST OF SYKES LANE AND WEST OF BRADFORD ROAD OAKENSHAW-  
KIRKLEES LOCAL PLAN PUBLICATION DRAFT -SITE REF E2700

James

Thank you for your response. I do consider that there is a good and continuing case for opening up a dialogue on the matters I have raised. I will be writing again to Julian Jackson, Assistant Director of Planning & Transport at Bradford MDC.

Since writing to you I have read Andy Haigh Associates October 2016 report produced for the Leeds City Region LEP and West Yorkshire Combined Authority entitled:- "Strategic Employment Land Review for the Leeds City Region". This has a very significant section (No.6) entitled "Duty to Cooperate and Strategic Issues". Paragraphs 6.1 to 6.4 and the associated plans are I feel very supportive of the arguments I am making on behalf of my clients. The 'spill over' of travel to work across local authority boundaries and changes to the TTWA's of Bradford and Kirklees between 2001 and 2011 censuses are highlighted. Paragraph 6.4 second bullet point identifies "North Kirklees which lies in the Huddersfield TTWA and is partly in the Bradford TTWA and partly in the Leeds TTWA" as one of only five areas in the City Region "which may require attention in the dialogue through the duty to cooperate."

These points together with the strategic nature of the M606 corridor and the mid section of the M62 corridor as existing and future locations for employment together with an identified shortage of good deliverable sites in Bradford District (particularly in south Bradford) do combine to make a strong case for reconsideration of an employment allocation on our clients land.

Finally a further argument emerges from the LCR/Combined Authority report in relation to the shortage of good strategic sites for B1 office/R& D especially where these are more transport dependent. The concentration of existing manufacturing at this focal point of West Yorkshire and the identification of this area as one where advanced manufacturing should be concentrated in future adds to the requirement for support services and R&D in business park formats close to motorway junctions. Some examples of the type of occupants that would be attracted are IT firms, supply and servicing of office equipment, smaller and medium sized accountancy and management consultancy firms who cannot afford Leeds City Centre rents and small to medium independent R&D firms with expertise in advanced manufacturing.

I will be interested in your further comments when you have considered these additional arguments.

Kind Regards

Clive

Sent from [Mail](#) for Windows 10

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**From:** [James Barker](#)  
**Sent:** 30 March 2017 14:31  
**To:** '[Clive Brook](#)'

Cc: Richard Hollinson; [duncanpask@yahoo.co.uk](mailto:duncanpask@yahoo.co.uk); [jjj@dacres.co.uk](mailto:jjj@dacres.co.uk)

Subject: RE: LAND TO THE EAST OF SYKES LANE AND WEST OF BRADFORD ROAD OAKENSHAW-  
KIRKLEES LOCAL PLAN PUBLICATION DRAFT -SITE REF E2700

Dear Clive,

Thank you for your email. Having given the issues some further consideration the Council acknowledge the advice of PINS in relation to holding meetings in advance of the EiP with objectors, however, as you are aware the Council are committed to submitting the Local Plan to the Secretary of State in the very near future and do not therefore propose to make any main modifications at this late stage – the inclusion of your clients site or amendments to the site appraisal outcome would be considered a main modification.

In view of this it is felt that in the immediate term the best forum to discuss and hopefully address the issues raised would now be through the EiP process. We are however open to further dialogue as the EiP progresses at a later stage should that be appropriate course of action at the time.

Kind regards.  
James

*James R C Barker* BA (Hons) MA, MRTPI

Planner  
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**Kirklees Council**

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Email: [James.Barker@Kirklees.gov.uk](mailto:James.Barker@Kirklees.gov.uk)  
Website: [www.kirklees.gov.uk/localplan](http://www.kirklees.gov.uk/localplan)

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**From:** Clive Brook [mailto:[clivebrookplanning@outlook.com](mailto:clivebrookplanning@outlook.com)]

**Sent:** 21 March 2017 16:48

**To:** James Barker

**Cc:** Richard Hollinson; [duncanpask@yahoo.co.uk](mailto:duncanpask@yahoo.co.uk); [jjj@dacres.co.uk](mailto:jjj@dacres.co.uk)

**Subject:** LAND TO THE EAST OF SYKES LANE AND WEST OF BRADFORD ROAD OAKENSHAW-  
KIRKLEES LOCAL PLAN PUBLICATION DRAFT -SITE REF E2700

Dear James

Further to our helpful telephone conversation this afternoon I confirm that I am now acting as the planning agent for the landowners in promoting this site through the remaining stages of the Local Plan. Until recently the site has been promoted by my former company Johnson Brook Planning Ltd and we have made submissions at each stage of the plan consultation process.

Thank you for taking the time to discuss various aspects of this currently rejected employment allocation proposal. At the end of our discussion I still felt that it would be very useful if we could meet to discuss certain aspects of the Council's site assessment and the conclusions of the suite of planning and technical reports which we submitted on the 1<sup>st</sup> February 2016 and our objections to the Publication Draft, on grounds of unsoundness submitted on the 19<sup>th</sup> December 2016. As you know the Government encourages planning authorities and objectors to discuss objections at this stage and in advance of the Examination in Public with a view to exploring possible agreement or at least the narrowing of the objection content thereby saving time at the EIP. I understand that the Council will very shortly be submitting the plan to the Secretary of State. You suggested that I summarise the areas for discussion and possible agreement and you would discuss the possibility of a meeting with Richard Hollinson.

Having reviewed the Council's most recent assessment of this site against sustainability and site selection criteria it is clear that the rejection was very marginal. I feel that if certain factors were briefly re-examined, particularly taking into account the conclusions of the technical reports produced in response to the Council's earlier site assessment and the assessment of green Belt impact then combined with my other points, re-stated below, a different conclusion could result.

The green belt assessment in the site selection analysis is contradictory and to a significant degree inconsistent with that undertaken for the neighbouring North Bierley WWTW site. The development of the North Bierley site along the lines indicated in the concept plan submitted by Keyland Developments has the same level of impact in reducing the gap between Oakenshaw and Cleckheaton. Various existing developments already reduce that gap, which is not identified as strategically important. The removal of our clients land from the green belt will not take development further south than the North Bierley proposed employment allocation and the net development we propose will fit very well within the existing development framework. The site is contained by the former railway line to the west and by Bradford Road and existing development to the east/south east.

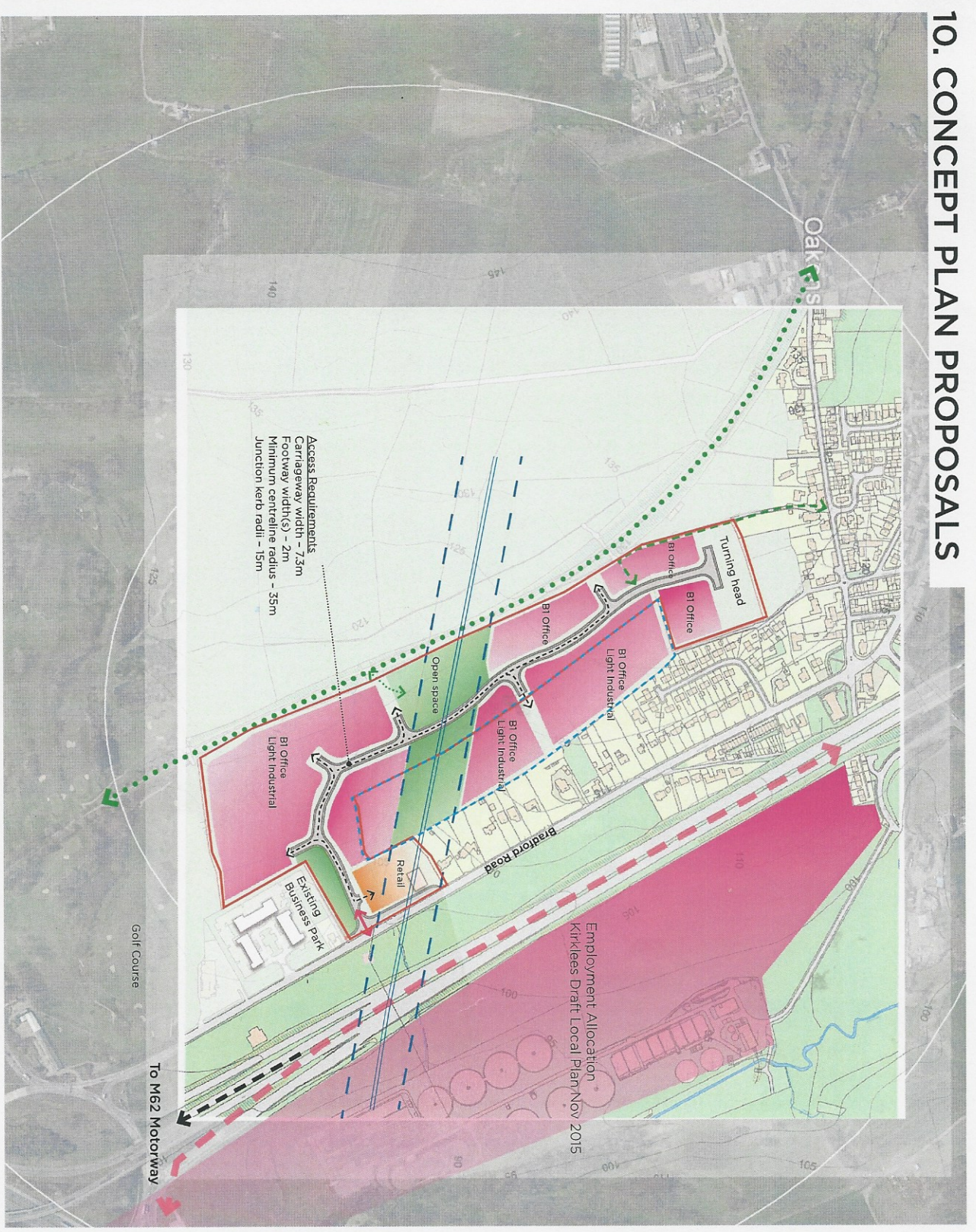
Finally it would be helpful to discuss our objections on the soundness of the plan as currently drafted and in particular that relating to the duty to co-operate with neighbouring councils, in this case Bradford MDC. Bradford is short of employment land and in particular good quality sites, one of the priority areas they identify being the M606 corridor. In the context of the Leeds City Region Plan and the work of the West Yorkshire Combined Authority it is perfectly logical and appropriate to allocate this site as a medium sized business park in this strategic location within the West Yorkshire conurbation. The site is being promoted for B1 office with some R&D and light industry and this use class is not well catered for in the proposed distribution and classification of proposed allocations in Kirklees.

I would be obliged if you would consider these matters and hope that you will agree that a meeting would be beneficial.

Yours sincerely

Clive A Brook FRTPI

10. CONCEPT PLAN PROPOSALS



Key 20

- Site boundary
- Adjoining land parcel to facilitate development
- Site entrance
- Main vehicular circulation
- Sustrans Cycle Route
- Existing pedestrian links
- Potential pedestrian links
- Overhead power line no development within a 30m offset
- BI Office/Light Industrial Development Cells
- Retail Units
- Open space
- Highways England Transport Scheme Kirklees Draft Local Plan Nov 2015

|     |            |          |                    |                          |                   |
|-----|------------|----------|--------------------|--------------------------|-------------------|
| Ref | Date       | Revision | Title              | Dwg No 01                | Scale 1:2500@A3   |
| XX  | XX.XX.XXXX | XX       | Concept Masterplan |                          |                   |
|     |            |          | Project            | Bradford Road, Oakenshaw | Date January 2016 |
|     |            |          | Client             | Schofield and Pask       |                   |

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