

**Proposed Strategic Employment  
Site  
Representation to Kirklees Local  
Plan: Publication Draft**  
Land at Cooper Bridge, Huddersfield

December 2016

**Turley**

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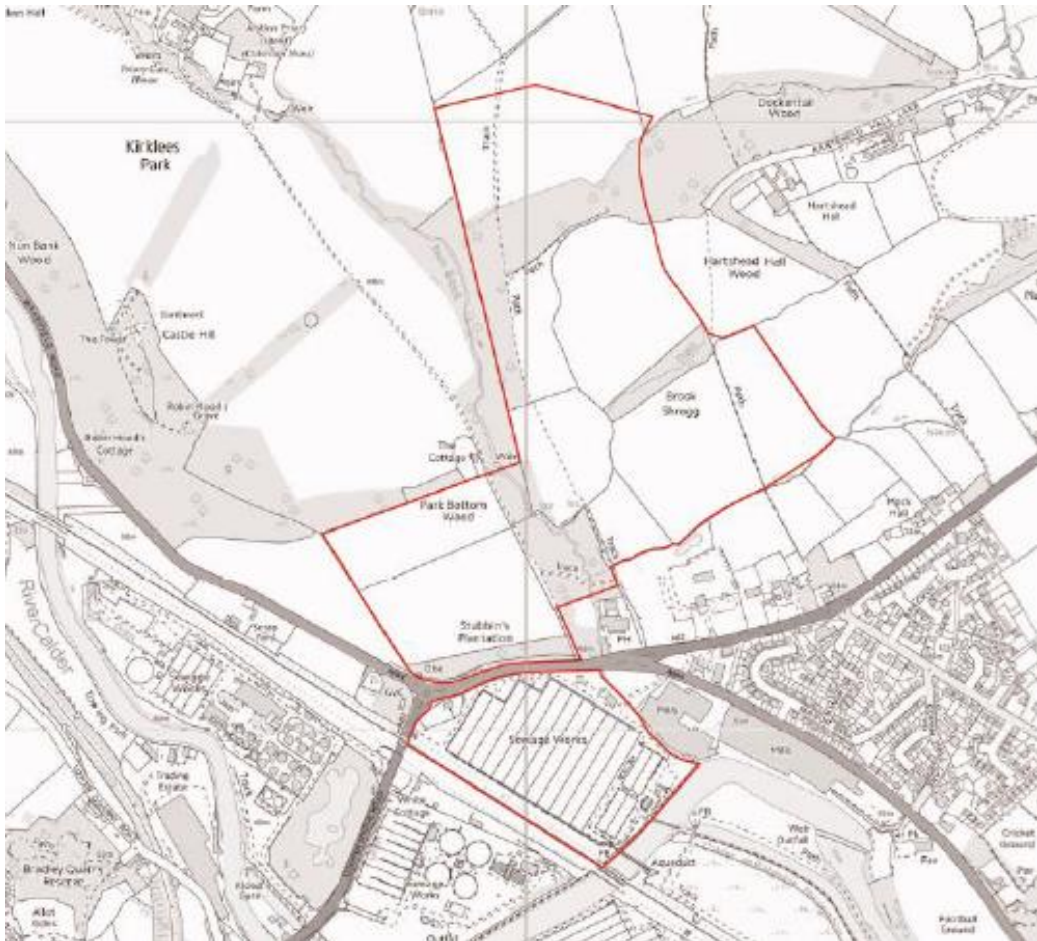
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# 1. Introduction

- 1.1 This representation is prepared by Turley on behalf of Keyland Developments Ltd and the Kirklees Estate in relation to the ongoing promotion of land at Cooper Bridge, Huddersfield as a 'Strategic Employment Site'.
- 1.2 This representation to the Publication Draft Kirklees Local Plan should be read in conjunction with – and as an update to - the representation that was submitted in February 2016 to the Consultation Draft Kirklees Local Plan (see Appendix 1). As such, it is considered that the majority of the supporting arguments included in that document remain valid and are not repeated in this representation.
- 1.3 Turley and the Cooper Bridge consultancy team have been working with Kirklees Council for c.2 years to bring forward this strategically important site. This process continues. The current position and the latest work to support the site's allocation is set out in Section 4 of this document. This work is ongoing in respect of certain matters and the consultancy team are liaising directly with key consultees to the Local Plan; including Historic England and Highways England.

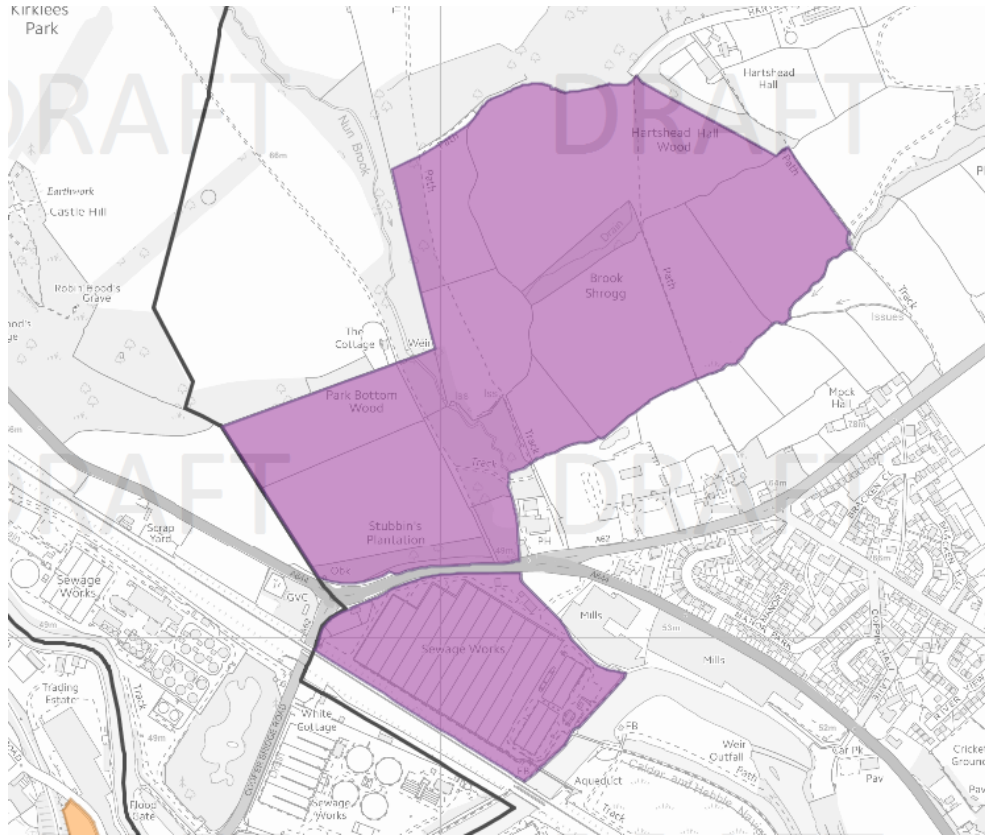
## 2. Site and Proposed Use

- 2.1 The Cooper Bridge site is described in detail in Section 2 of the February 2016 Representation (see Appendix 1) and this document will not repeat that description. The proposed use of the site as a 'Strategic Employment Site' remains unchanged and this is supported through this representation.
- 2.2 It is important to note that the northern and eastern site boundaries have changed slightly; although the overall site area has remained almost the same (ie 46 hectares).
- 2.3 The former proposed red line site boundary is shown below.



- 2.4 The northern site boundary has moved south and is now defined by the southern boundary of Dockettail Wood. The eastern boundary has also changed and now extends further east; defined by the south-west boundary of Hartshead Hall Wood and a field boundaries, as opposed to invisible contour lines.

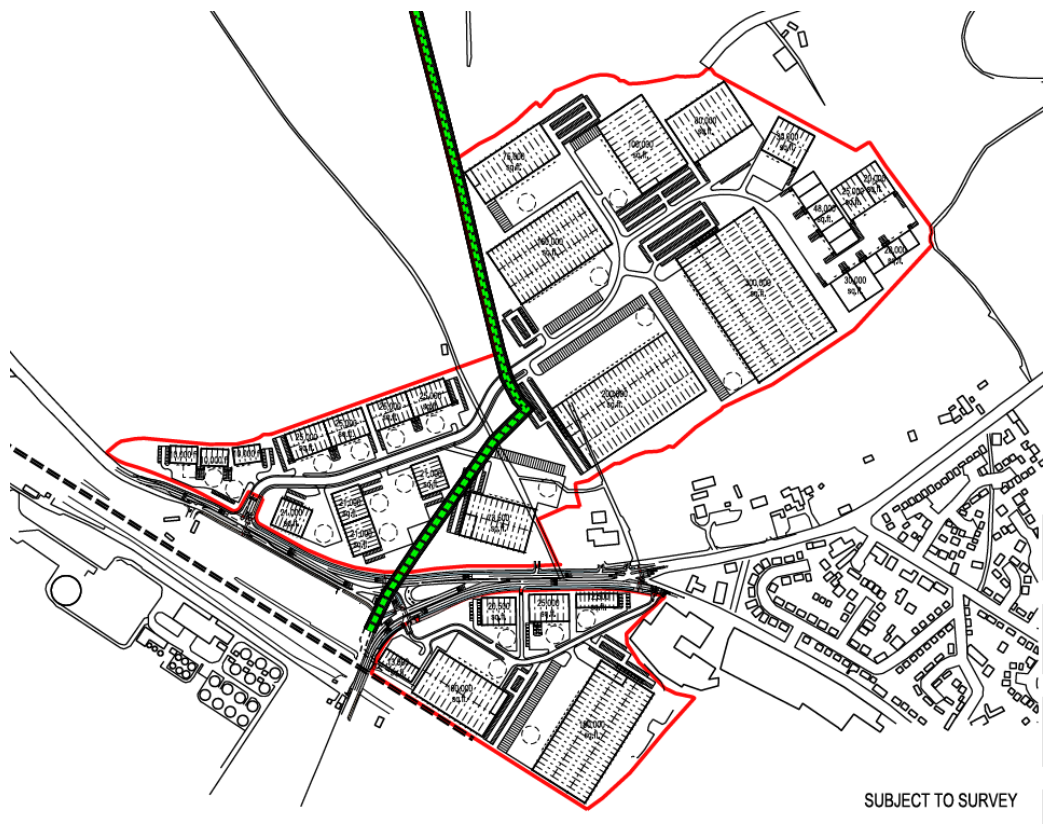
2.5 The new site boundary – taken from the Publication Draft Kirklees Local Plan Proposals Map - is shown below, with an illustrative site layout included in Chapter 3. Please note that the thick black line shown on the plan below is the Kirklees/Calderdale boundary



2.6 This representation supports the revised site boundaries. They are considered to be more robust and defensible, and as such more in accordance with Green Belt policy. The changing boundary does not impact on the proposed site's deliverability, nor the quantum of floor space proposed.

### 3. Proposed Allocation

- 3.1 This representation supports the proposed allocation of the site as a 'Strategic Employment Site'. It remains the case that the site is likely to be developed in such a way that it targets advanced manufacturing, precision engineering and high quality distribution employment-generating uses.
- 3.2 The latest iteration of the evolving site layout plan is shown below for information purposes. This shows land in Calderdale, as well as Kirklees (see Paragraph 2.5 above).



## 4. Next Steps

- 4.1 The Cooper Bridge consultancy team continues to work on the evolving layout plan. The team includes heritage and landscape consultants, an architect and highways consultant, as well as an engineer. A meeting is in the process of being arranged for early 2017 to progress the heritage and landscape proposals for the site. This will lead to further engagement with Historic England.
- 4.2 The proposed heritage and landscape work will specifically address the impact on the setting of listed buildings and residential dwellings in the vicinity of the proposed site, as well as the Kirklees Estate registered park.
- 4.3 Highway matters are also being progressed. At present, Kirklees Council are continuing with modelling and design work associated with changes to the road network in the vicinity of Cooper Bridge. The Cooper Bridge site highway consultant continues to liaise with Kirklees Council's Highways Team.
- 4.4 As the strands of work above are completed, it is the intention of the Cooper Bridge consultancy team to produce a revised indicative layout plan and share this with Kirklees Council. This layout plan can then be taken forward to the Examination in Public.

## 5. Publication Draft Overview and Tests of Soundness

- 5.1 The Publication Draft Local Plan – Allocations and Designations ‘Employment Allocations’ document refers to the Cooper Bridge site as ‘Site 1832c’. This representation agrees with the overview of the site; including the identified constraints and reports required to accompany any future planning application. The ‘Other Site Specific Considerations’ section specifically focusses on the following four matters:
- economic strategy
  - landscape character
  - the setting of designated heritage assets
  - highways
- 5.2 It is considered that the future development of the Cooper Bridge site remains economically of strategic importance to the Leeds City Region and Kirklees Council. As such, the Council and Cooper Bridge consultancy team will continue to work together to progress the site - up to, during and beyond the forthcoming Examination in Public.
- 5.3 The proposed site’s landscape character and associated impact on the setting of listed buildings continues to evolve. It is acknowledged that these matters are crucial to the proposed development’s success and will be assessed in detail. 3D modelling, based on defined plateau levels and building heights, will be progressed so that the visual and heritage impact of the proposal can be properly assessed. Landscaping will also be considered in relation to nearby residential dwellings.
- 5.4 The proposed improvements to the A62/A644 Huddersfield to Leeds highway network, as well as the proposed new motorway junction at 24a on the M62 are supported through this representation. Site TS1 and TS2 in the Transport chapter of the Publication Draft Local Plan are supported; both schemes will improve highway access to the Cooper Bridge site.

### Tests of Soundness

- 5.5 Paragraph 182 of the NPPF states that a Local Planning Authority should submit a plan for examination which is ‘sound’. Applying this to Kirklees means that the Council’s Planning Department should have prepared the Publication Draft Local Plan so it is ‘sound’; namely positively prepared, justified, effective and consistent with planning policy.
- a) Being ‘positively prepared’ means that the Local Plan seeks to meet objectively assessed development and infrastructure requirements. Kirklees Council have done this by identifying an employment land shortfall and allocating appropriate market-facing sites that are targeted at this growing sector.



- b) Being 'justified' means that the plan should be the most appropriate strategy, when considered against reasonable alternatives. Kirklees Council have done this by identifying a number of sites for employment use that meets market requirements. They have considered and allocated alternative sites, such as those at Chidswell and North Bierley, and therefore meet this test.
- c) Being 'effective' means that the Local Plan should be deliverable over the plan period. By working alongside Calderdale Council, WYCA, Highways England, Historic England and others to ensure each of the allocations is progressed, Kirklees Council demonstrated how effective their Local Plan is. The delivery of the Cooper Bridge proposed strategic employment site is also linked to major highway improvements and these are included in the Plan.
- d) Being 'consistent with national policy' means that the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. Kirklees Council's ongoing support and collaboration demonstrates their intention to support the delivery of the Cooper Bridge site as a strategic employment site and as such, meet this test of soundness.

5.6 This representation considers that the Cooper Bridge allocation has been prepared in a 'sound' manner, but acknowledges that further work needs to be undertaken prior to the forthcoming EiP; specifically relating to highway, heritage and landscape matters.

## 6. Conclusion

- 6.1 This representation is prepared by Turley on behalf of Keyland Developments Ltd and the Kirklees Estate, the joint owners of the Cooper Bridge site. The representation supports the ongoing promotion of land at Cooper Bridge as a 'Strategic Employment Site'. This representation to the Publication Draft Kirklees Local Plan should be read in conjunction with – and as an update to - the representation to the Consultation Draft Kirklees Local Plan.
- 6.2 Turley and the Cooper Bridge consultancy team have been working with Kirklees Council for c.2 years to bring forward this strategically important site. This process continues in a way that meets the NPPF's 'tests of soundness' and will do so up to and beyond the forthcoming Examination in Public.

**Appendix 1: Representation to Draft  
Kirklees Local Plan.  
February 2016**

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