



CRIGGLESTONE PARISH COUNCIL

Web site: www.crigglestonepc.org

Ms S Mozer – Clerk to Crigglestone Parish Council
104 Field Lane, Upton, Pontefract, West Yorkshire, WF9 1DB
Tel: 07419 585 227
Email clerk@crigglestonepc.org

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APPROVED RESPONSE TO LOCAL DEVELOPMENT PLAN CONSULTATION

The Key Aims of the Parish Council in the Local Plan process are:

- Retention of current Green Belt boundaries.
- Improving (or at least not worsening) the existing very poor Air Quality.
- Preventing further increase in traffic (link to air quality).
- Preventing the despoliation and intensification of inappropriate traffic generating uses at Pugneys Country Park; and promote the existing sustainable levels of activity and use compatible with a Country Park and its local setting.
- Promoting more tree planting, hedgerows, and habitats to encourage wildlife and carefully extending footpaths and bridleways to enable LOCAL access to the open land, to facilitate interaction with nature and the natural environment, to improve wellbeing in the unique setting of the Green Belt to the south west of Wakefield in the Parish of Crigglestone, which links to the wider West Yorkshire Green Belt beyond; and
- That the historic rural and distinct communities that make up the Parish of Crigglestone in the West Riding of Yorkshire are identified in the Local Plan Settlement Hierarchy and not as part of Wakefield Urban Area.

VOLUME 1 POLICY WSP2

We consider that, in principle, all substantial new development should be within a convenient walk of a rail station that has a good service, as a key indicator of walkability. We note that the Calder Park and Broad Cut Farm site allocations (LP200 and LP1411) are in Crigglestone Parish at Durkar and Calder Grove, which is grouped in with Wakefield City for the purposes of the settlement hierarchy. Yet this location almost 3 miles from central Wakefield, further than Stanley/Outwood which is classed as a separate urban area and has its own rail station. Therefore, the definition of Wakefield City in the hierarchy is distorting the level of development being directed towards these relatively inaccessible places, and this is very likely to generate disproportionate car dependence.

6.10 and POLICY WSP4

The Parish Council objects to the identification of safeguarded land, and therefore to this policy. The problem is that spatial objectives in a future plan period may change, so whilst the safeguarded is not needed in the current plan period, there is no evidence that it will be in suitable, sustainable locations for implementing the spatial objectives of future plans. Consequently, there is no sound basis for removing it from the Green Belt and the exceptional reasons test cannot be proven using the evidential test.

POLICY WSP9

We object to WSP9(d)'s proposal for a Special Policy Area at Broad Cut Farm, Calder Grove (LP1411), because it will locate both housing and an Advanced Manufacturing Park - which would (hopefully) have quite a high employment density - in a location that will be overwhelmingly accessed by private car transport. This would be an unsustainable pattern of development, which does not therefore justify exceptional circumstances for its removal from the Green Belt. Consequently, it should not be included in WSP9.

VOLUME 1

POLICY WSP21 GREEN BELT

PAGE 65

Whether standing at Sandal Castle and looking at the magnificent vista from the horizon and following the countryside and Green Belt as it sweeps down to the Calder Valley and follows the river round to Pugneys Country Park and the land between Durkar and Sandal or looking at a map, this is a unique topographical setting. This magnificent environmental asset should be cherished and protected to provide an essential 'Green Lung' to offset the damaging intrusion of the M1, traffic congestion and the resultant very poor air quality. The Green Belt is critical and fulfils all the five purposes in the NPPF. Parts of the Green Belt are narrow and are therefore, even more key in protecting and safeguarding the strategic settlement gaps.

- We strongly support the existing Green Belt boundaries and strongly object to the proposed removal of the Land at Calder Park (Broad Cut Farm) LP1411 and Asdale Road Policy LP 1332 for Safeguarded Land.
- We strongly support the identification of Strategic Green Belt Essential Gaps.

- We do not agree with the scoring for Durkar Low Lane Green Belt E.g., Supports Historic Views should be 5, not 1 as the land enables uninterrupted views of Sandal Castle from most locations.
- We do not agree with segmented scoring for Green Belt south of River Calder, as this acts as an integral whole, in view of the setting, size and location.
- There are no exceptional circumstances to remove the land.
- The land fulfils the five purposes of the Green Belt.

In view of Air Quality Zone there are exceptional reasons for it to remain Green Belt, acting as an essential Green lung and preventing further increases in Air pollution.

Removal will conflict with its Strategic Green Belt essential gap status.

These are not sustainable development proposals, one community (Crigglestone Parish) is bearing the brunt of environment destruction and increased pollution, with the resultant impacts upon mortality and long-term health conditions. The community is under incredible pressure from nearby commercial uses and the traffic that is generated, including that from south Kirklees and north Barnsley which use Jct 39 M1.

The Green Belt is an intrinsic part of the Parish of Crigglestone's identity and environment and we feel that this is been aggressively and repeatedly targeted.

Any justification of exceptional circumstances for Green Belt change must be based not just on the quantitative provision of land supply for development, but on the full set of sustainability outcomes that those changes would enable and on the impact those proposals would have on adjacent communities. NPPF2019 effectively establishes a sequential approach in which the Local Plan must show:

- Firstly, that it has fully explored all non-Green Belt options to make the most efficient use of land.
- Secondly, that compensatory arrangements are made for the harm that results from land being lost from the Green Belt.

There is also a two-stage test of exceptional circumstances, firstly as to whether there is an overall need for Green Belt change, and secondly whether specific proposed changes will have justifiable and sustainable local outcomes.

Full use should be made of optimising residential densities, with high densities on those sites that can support them and resulting reduction in overall land take that may remove the need for some allocations.

It is also essential that any change to the Green Belt produces an outcome that is demonstrably sustainable in its own right. It must contribute to the Plan's strategic objectives as a whole and to NPPF, not simply be justified on a quantitative basis. For example, a Green Belt change that results in substantial increases in road traffic and/or greenhouse gas emissions and exacerbates existing poor air quality is not sustainable, and there is no justification for releasing development land that would enable this type of unsustainable outcome.

The Parish Council object to the allocation of Green Belt sites that have significant issues for: flood risk, the impact on the highway network, exacerbating existing poor air quality, ecological and green space issues. These represent very substantial sustainability challenges. In our view these cannot be separated from the question of whether exceptional circumstances exist to change Green Belt boundaries. The Plan must be able to demonstrate that all these issues can be resolved, because otherwise the Green Belt changes come with an unacceptable and significant risk of unsustainable outcomes.

The Parish Council view is that exceptional circumstances for Green Belt change can only be shown if it is clear that the resulting development will produce a demonstrably significant sustainable outcome. The Plan does not demonstrate this, so this Policy is not sound.

We would propose that the second paragraph of the Policy is deleted, and a third paragraph added that states: 'It must be clear that the resulting development will produce a demonstrably significant sustainable outcome'

The Air Quality wording is too weak to deal with this very important health issue. Crigglestone Parish Council suggest the following:

Where an Air Quality Management Area may be affected by development, that development should only be allowed in exceptional circumstances, which would include a full health and traffic impact assessment considering all current and future legislation.

Reason: To recognise that air pollution and traffic pollution are responsible for a significant level of mortality and serious impacts upon physical and mental health.

Existing poor air quality levels should not be exacerbated by development.

VOLUME 1	POLICY WLP24 LEISURE OPPORTUNITY AREA	PAGE 109
VOLUME 1	POLICY WLP25 RECREATIONAL USE OF WATER RESOURCES	PAGE 110
VOLUME 1	POLICY WLP48 SPORT FACILITIES	PAGE 142
VOLUME 1	POLICY LP 138 PUGNEYS LEISURE OPPORTUNITY AREA	PAGE 179

The above policies taken together with the WMDC intention to commercialise Pugneys Country Park, pose a severe threat to the fine balance between wildlife and nature conservation and ~~the~~ those of leisure and recreation. To maintain this balance there is a need to prevent the intensification of inappropriate commercialised development and uses that are traffic generating.

The context for Pugneys Country Park setting is as follows:

Whether standing at Sandal Castle and looking at the magnificent vista from the horizon and following the countryside and Green Belt as it sweeps down to the Calder Valley and follows the river round to Pugneys Country Park and the land between Durkar and Sandal or looking at a map, this is a unique topographical setting. This magnificent environmental asset should be cherished and protected to provide an essential 'Green Lung' to offset the damaging intrusion of the M1, traffic congestion and the resultant very poor air quality.

WMDC needs to work with the LOCAL Community representatives and organisations together with national and county wildlife and environmental bodies to develop a strategy that will protect and nurture this asset with levels of activity and use compatible with a Country Park and its local setting. Crigglestone Parish Council view is to promote more tree planting, hedgerows, and habitats to encourage wildlife and carefully extending footpaths and bridleways to enable LOCAL access to the open land, to facilitate interaction with nature and the natural environment, to improve wellbeing in the unique setting of the Green Belt to the south west of Wakefield in the Parish of Crigglestone, which links to the wider West Yorkshire Green Belt beyond.

This would widen the Country Park and incorporate Sandal Castle as a key focus on the skyline and as an historical asset to be protected and enhanced.

Appendix 1 Settlement Hierarchy

The Parish Council objected to the dismemberment of the communities and settlements in Crigglestone Parish with some being subsumed as part of Wakefield Urban Area and others identified separately. We would like to challenge current position and achieve the following:

That the ten historic rural and distinct communities that make up the Parish of Crigglestone in the West Riding of Yorkshire are identified in the Local Plan Settlement Hierarchy and not as part of Wakefield Urban Area.

Most of the Wakefield City Urban area is located north of the River Calder.

The communities of Crigglestone Parish are situated to the south of the River Calder.

These two are separated by both the Green Belt and the River Calder.

The only very minor break in the Green Belt is at the point of Kettlethorpe High School, which sits between the Durkar and Newmillerdam Green Belts. To suggest that the communities of Crigglestone Parish are therefore part of Urban Wakefield is absurd.

The WMDC accessibility map, identifies all the communities in the parish as in the low category, which is consistent with other village settlements.

There is a distinct administrative history. Up to 1974 Crigglestone Parish was part of the Rural District Council of the West Riding County Council and Wakefield was its own city borough.

The Parish Council has existed since 1894, whilst WMDC has existed from 1974.

WMDC's position is not in accord with the Statement of Community involvement.

If this Planning process is about people and places, then the current situation needs to be righted.

VOLUME 2 LP1411 CALDER PARK NEW SPECIAL POLICY AREA

PAGES 46-47

This is a large removal of Land from Green Belt. Was not in the Initial Draft Plan.

The Parish Council strongly objects to the Policy as unsound for the following **reasons**:

Statement of Community Involvement

WMDC Statement of Community Involvement 2017 states:

"The Council places great importance on effective community involvement. In planning, we are committed to public engagement in preparing planning policies and in considering planning applications. It is important to us that all sections of the community are given the opportunity to

take part in the planning process at the earliest opportunity so that decisions can take account of the range of community views and reflects, as far as possible, the concerns and aspirations of the people affected by them”.

The SCI goes on to state that “It is the Council’s intention to ensure that all relevant stakeholders are involved in the preparation, alteration and review of all Local Plans”. A list of organisations, community groups and other consultees is set out in Appendix 2 of the SCI. The Parish Council is a statutory consultee.

The Parish Council cannot see that WMDC have met the above requirements as there has been no proactive engagement or consultation with the Parish Council regarding this major alteration.

The Parish Council would have thought that given consultation on the Initial Draft Plan ended in February 2019 and the WMDC Council meeting to approve the submission of the Draft Local Plan was in October 2019, there was time for a 4-6-week public consultation on proposed major changes like the removal of Green Belt and development at Broad Cut Farm.

National Planning Policy Framework – Green Belts

The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; **the essential characteristics of Green Belts are their openness and their permanence.**

Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas.
- (b) to prevent neighbouring towns merging into one another.
- (c) to assist in safeguarding the countryside from encroachment.
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Fulfils the purposes of the Green Belt.

The Site fulfils all five purposes of the Green Belt and even by WMDC’s own methodology is categorised as Strong, with a score of 32. This is a higher category and score than any of the adjoining areas of Green Belt within the Strategic Gap.

The Green Belt Exceptional Circumstances Statement assures the general public that the existing boundary: “has resisted ribbon development which would otherwise result in the reduction of perceived separation between settlements”; and “resists development that would result in physical

and visual merging, coalescence, or significant erosion, of a valued gap between neighbouring settlements”

For the strategic reasons outline in our response to WSP21, we do not accept that exceptional circumstances for Green Belt change have been demonstrated.

Strategic Green Belt

Whether standing at Sandal Castle and looking at the magnificent vista from the horizon and following the countryside and Green Belt as it sweeps down to the Calder Valley and follows the river round to Pugneys Country Park and the land between Durkar and Sandal or looking at a map, this is a unique topographical setting. This magnificent environmental asset should be cherished and protected to provide an essential ‘Green Lung’ to offset the damaging intrusion of the M1, traffic congestion and the resultant very poor air quality. The Green Belt is critical and fulfils all the five purposes in the NPPF. Parts of the Green Belt are narrow and are therefore, even more key in protecting and safeguarding the strategic settlement gaps.

This site is the Key link in the Green Belt chain set out above.

Strategic Green Belt Gap

The Green Belt is at its narrowest point between the Horbury Junction Industrial Complex and Broad Cut Farm at Calder Grove. To remove this site from the Green Belt would have a significant impact upon an already narrow strategic gap (see arial photograph below). This impact would be even more profound for the reasons set out below.

Openness and Topography

This site is key to maintaining the openness of the Green Belt at its narrowest point. The topography of the surrounding land and features give this land a critical role in the functioning of the Green Belt. This site sits on the south bluff of the River Calder flood plain, it has a commanding position in relation to the other parts of the Green Belt that adjoin it. These are low lying and are in part covered by the River Calder, Calder and Hebble Canal and the post-industrial Lagoons at Horbury. It is only beyond the Huddersfield-Wakefield railway line that the land starts to rise to the northern bluffs of the River Calder at Horbury.



So, in terms of its immediate surroundings, this site is the dominating area of Green Belt, which lies to the south of the River Calder. Very importantly it is the dominating feature of the Green Belt in the narrow strategic Gap. To remove this site would severely compromise the functioning of the Green Belt strategic Gap. However, the most important feature of this site is that due to topography and land use this site provides the dominating features of Green and Openness. The water features to the north and a line of large poplar trees on the riverbank, together with the buildings within the Green Belt to the south of the Horbury Junction Industrial site, mean that this site is the one that provides the dominating feature of openness, which is the essential role of the Green Belt and it is this site that provides that role.

Travelling south on the M1 from junction 40 and after crossing the River Calder the Broad Cut Farm site suddenly opens up in a Green Open vista that stretches through the Green Belt and countryside beyond to the horizon at Emley Moor.

It is critical that this site is retained as permanent open Strategic Gap Green Belt.

Green Belt and Open space lost in Parish over last 30 years.

There has been a significant loss of Green Belt and open space in the Parish of Crigglestone over the past 30 years, exacerbated by the current proposals.

Other sites that could be considered

There are several other sites that could be utilised for development:

Healey Mills is a very large Brownfield site that could easily accommodate this use and has major advantages including providing a rail link, this would reduce the traffic and carbon footprint.

Speedy Bake the former Speedy Bake is an industrial site in Wakefield.

Junction 40 M1 there are several sites in this location that are less critical to the Green Belt than Broad Cut Farm and have a lesser score in terms of function.

Ferrybridge Power Station this is a major Brownfield site that will be available post decommissioning

Calder Park WMDC have recently given permission for a none B1 use on the grounds there is no commercial market interest for such use at this location, a situation that will not improve in the post Covid-19 world. The site has ample available space to accommodate the uses proposed.



The late insertion of this site in the Plan process clearly indicates that there are no strategic or exceptional reasons for this.

The production of the Local Plan began in Late 2017 and this site was not included in the Initial Draft plan that was put out to consultation, which ended in February 2019. Indeed, there were no expressions of interest put forward before February 2019. The first public appearance in the WMDC Plan was in the Autumn of 2019, so clearly there is no credible strategic or exceptional need that has suddenly arisen, so late in the process.

Calder Park provides all the evidence one needs to see what the promises of exceptionality produces.

We have been here before with WMDC arguing for exceptional reasons to remove land from the Green Belt. We were told at a previous Public Examination in the early 1990s that there was a strategic and exceptional need for a High Technology Business Park at Durkar. The land had hardly been removed from the Green Belt when WMDC decided it would be the home of Yorkshire County Cricket Club. So much for the exceptional strategic need!

So, what exactly has been delivered at Calder Park in terms of the exceptional High Technology Business Park, that was promised as the reasons for removing this from our Green Belt?

2 x Public Houses

5 x Fast Food Take-Aways

1 x Petrol Station

1 x Budget Hotel

5 x Retail Car Showrooms.

Even by WMDC's own figures 49% of the site is none B1 use! Of the rest, little would qualify as 'High Technology'.

The land was taken from the Green Belt for uses that are clearly not exceptional or in the Plan Policy and should have been accommodated on Brownfield sites.

So, the arguments for Broad Cut Farm can be viewed in the light of the evidence at Calder Park. The Green Belt land at Broad Cut Farm should not be treated in the same manner.

Not sustainable – over development.

We consider this site an inappropriate extension to the urban area of Wakefield because it is too remote from central Wakefield and the overwhelming majority of journeys to and from the site will be by private car. Green Belt change should not enable unsustainable patterns of development.

This is not a sustainable development proposal, one community (Crigglestone Parish) is bearing the brunt of environment destruction and increased pollution, with the resultant impacts upon mortality and long-term health conditions. The community is under incredible pressure from nearby commercial uses and the traffic that is generated, including that from south Kirklees and north Barnsley which use Jct 39 M1.

This is one of two proposed largescale removals of land in the current Local Plan, following on from the large-scale removal of Green Belt land for the Calder Pak development and over 250 houses in the last Plan. This is not justified and is discriminatory targeting.

A sustainability appraisal for Broad Cut Farm was eventually published by WMDC in October 2020 (Appendix F) – see page 1507:

Please note the uncertainty and/or limited benefits in many of the categories listed.

- SA2 Growth: “a minor positive effect on this objective”.
- SA3 Education: “a developer contribution may be required for additional school places / expansion, an uncertain positive is likely”.
- SA4 Health: “a developer contribution may be required, likely to have an uncertain significant positive effect”.
- SA7 Leisure access: “an uncertain negative effect is likely”
- SA10 Safe transport: “the site is accessible by non-car-based means to less than 5% of 16-74-year olds in the district within 40 minutes, recorded at 1.15%, likely to have a significant negative effect”.
- SA11 Built environment: “an uncertain effect is recorded”.
- SA12 Biodiversity: “an uncertain significant negative effect is therefore recorded”.
- SA13 Pollution: “an uncertain minor negative effect is recorded; air quality mitigation will be required. The noise impact of the railway and motorway will need to be assessed and suitable mitigation provided”.
- SA14 Climate Change: “the location of development can have an impact on greenhouse gas emissions and climate change because of accessibility. The site is accessible by non-car-based means to less than 5% of 16-74-year olds in the district within 40 minutes, recorded at 1.15%, likely to have a significant negative effect.
- SA15 Flooding: “an uncertain effect is therefore recorded as the site is mainly within flood zone 1, low risk, where development is proposed with some areas of flood zone 3 near the River where development would not be permitted”.
- SA17 Use of Land (XX): “the site includes some grade 3a Agricultural Land. Existing development policies seek to protect agricultural land of Grade 3a and higher”.

Other sites assessed at this level of uncertainty (for example a site at Ossett adjoining the next M1 junction) were rejected by the Council. We fail to understand why this site at Broad Cut Farm (LP1411) was included.

Further detrimental impact on very poor Air Quality.

Large parts of Durkar are covered by an Air Quality Management Zone with very poor air quality and the nearest meter records levels of NO₂ at 38.2, which is very close to the legal limit of 40.

The proposed development would create more traffic and pollution which would exacerbate existing very poor air quality levels.

Continued development at the Calder Park Special Policy Area Housing developments at Sandal will likewise generate more traffic, pollution and exacerbate existing very poor air quality.

There is the danger that land at Asdale Road, Durkar could be developed for 300 plus house, again generating more traffic, pollution and exacerbate existing very poor air quality.

Developments in north Barnsley and south Kirklees will result in even more traffic using the Jct39 of the M1 again generating and exacerbating very poor air quality.

You simply cannot keep saying 'it will not make a difference' and 'we can mitigate this'. You cannot mitigate increased levels of mortality and chronic long- term health conditions caused by poor air quality by increasing the root cause of the problem!

The West Yorkshire Low Emissions Strategy (WYLES) contains the following headline statements:

- *In West Yorkshire, 5.1% of all deaths (1 in 20 deaths) are caused by exposure to particulate air pollution with up to 6% in some local authority areas.*
- *Motor vehicles are now the most significant contributor to poor air quality in West Yorkshire and around the country.*

Research in the Calderdale area suggests a projected 20% growth in car traffic and a 29% growth in light goods vehicle traffic over the period 2014-32. That is a car traffic growth rate of 1.11% per year, and if that continued to 2038 there would be a 30% growth in road traffic 2014-2038.

This issue has very serious consequences for individual and public health and cannot be left to the development management stage to 'mitigate'. Unsustainable traffic generating sites should not be

included in the Plan. Because of their impact on Air Quality (and the consequent impact on mortality and chronic long-term health) and Climate Change and Carbon Reduction.

The Plan as drafted is so road-dependent, a major re-think of the location of the site allocations is required and particularly in the case of Broad Cut Farm LP1411.

Unsustainable traffic levels.

The area already suffers from traffic saturation and this will become worse for the following reasons:

Other developments in Wakefield.

Continued development at Calder Park.

Housing development in Sandal.

Potential 300+ Housing development in Durkar.

Developments in north Barnsley and south Kirklees.

This development will only cause even greater problems. In respect of Broad Cut Farm, the sites assessment says that *“the developer is required to demonstrate that a suitable access from the adopted highway can be secured that will not impact on highway safety and efficiency, or the capacity of the Local Road Network.”* This cannot be left to the application stage: if there is any doubt as to whether the site can be safely and acceptably accessed, this must be resolved before the site is allocated. A site allocation provides a degree of certainty for developers that the principle of development is accepted by the LPA, and that cannot be the case if there is a subsequent onus for devising an acceptable means of access rests with the developer.

It is essential to protect an area functioning as a Green Lung

In view of all the factors set out above, it is essential that this site remains in the Green Belt to provide a critical ‘Green Lung’ which is at the prevailing upwind side of the M1 and Air Quality Management Zone. This enables less polluted air to be fed into the Air Management Zone.

Flooding

The north part of the site is in Flood Zone 2. The overall site lies adjacent to areas that are in Flood Zone 3a and 3b. Properties in these areas have been subject to repeated flooding.

The Environment Agency recorded that in the storm and floods of early 2020 the levels of the River Calder at Horbury Bridge exceeded the previous record levels recorded in 2015.

It would be a significant risk to place a development that will generate huge rainfall run off from roofs and hard standing that would create catastrophic flooding to adjacent high level flood areas and to Calder Grove and Durkar, which have inadequate drainage infrastructure. There are so many cases where we are told that measures are in place for once in a hundred-year events, only to see these overwhelmed in events that occur on more than one occasion in a decade. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.

The current flood risk management is not up to date.

Flooding frequently arisen on the A636 dual carriageway and the north side of the Jct 39 roundabout and in parts of Durkar and Calder Grove.

There are far too many risks to allow this site to be developed, any failure in systems would have catastrophic consequences for people and property.

Vital in providing well being

This site provides the community with a sense of wellbeing and tranquillity, with the sight of beef cattle grazing in the open Green Belt fields of a farmland setting. There is a public footpath across the site and access to the Calder and Hebble Canal path. The site provides all the necessary protection from development that is detrimental to both physical and mental health.

Loss of open space and environment.

This development would have a catastrophic impact on the open aspect of the environment, changing it from open Green Belt and farmland to industrial warehousing and housing. The size and topography of the development would be overwhelming. This would utterly change the aspect, amenity, and environment of the community.

In 2017 the site was also recognised as a valuable part of WMDC Leisure, Recreation and Open Space Local Plan (LA9) – Calder Valley Leisure Opportunity Area. It was there described “as a key area along the River Calder and Calder & Hebble Navigation adjoining Wakefield South, Pugneys Country Park and Calder Park Special Policy Area. It includes Horbury Lagoons and the British Oak coal disposal point with Local Wildlife Site designations, and Strategic Leisure Corridors.

Significant detrimental impact on wildlife life and ecology.

The proposed development will have a significant detrimental impact upon varied and numerous types of wildlife and ecology associated with a working farm, both on the site and surrounding areas.

Vital importance of contact to local environment highlighted in Covid-19 pandemic.

The Covid-19 pandemic has identified the crucial aspect that contact with the natural environment is for the physical and mental health and well-being of individuals. This Green Belt location provides both visual and physical opportunities for such contact (there is a public right of way through the site). Most crucially it is a local setting that is an intrinsic part of the communities setting.

Agricultural Farmland

Existing policies seek to protect agriculture land of Grade 3a and higher and it needs to be demonstrated that there is a particular need for the development, and that no alternative site of a lower grade is available. Some of the land Broad Cut is of that category.

Vital in protecting Rural identity.

This site provides the open Green Belt setting that is a key and intrinsic part of the rural identity of the historic community of Calder Grove. This is a fundamental issue in the protection of individual and community rural identity.

No exceptional reasons to remove from Green Belt – Unsound Policy - SUMMARY

The Parish Council have set out above the reasons that there are no exceptional reasons to remove the land from the Green Belt and indeed there are exceptional reasons to retain the area as Green Belt.

The Policy is unsound because it has not been brought forward in line with the Statement of Community Involvement. “It is the Council’s intention to ensure that all relevant stakeholders are involved in the preparation, alteration and review of all Local Plans”, the Parish Council have not been involved in the preparation or alteration of this Policy and proposed alteration to the Green Belt.

This Policy is a very late insertion into the Plan and demonstrates that there is no exceptional or strategic need for this site to be developed.

We have demonstrated the evidence provided by the development of Calder Park, that WMDC’s arguments for exceptional Strategic need are at best a ‘mirage’ and the undoubtedly the same would be the case at Broad Cut Farm. This would lead to traffic and pollution generating, inappropriate development.

There are several alternative sites available and we evidence that Calder Park has the space available, particularly as there is no commercial market for B1 office use, a situation that is not going to improve post Covid-19.

The development would exacerbate existing levels of very poor air quality. Large parts of Durkar are covered by an Air Quality Management Zone and the nearest meter records levels of NO2 at 38.2,

which is very close to the legal limit of 40. Even with mitigation measures this level would increase. Poor air quality is responsible for tens of thousands of deaths across the UK, and for cases of chronic long-term health conditions.

The site would create additional traffic generation and pollution which would add to a highway infrastructure that is saturated, not only with traffic from within Wakefield, but from north Barnsley and south Kirklees. We do not think that sufficient notice has been taken of this and the impact on the communities who live in Crigglestone Parish and on the strategic Highway network. Likewise, there would be a negative impact on any climate change and carbon reduction targets and strategies.

The site is adjacent to the River Calder flood plain and Zone 3 Flood Risk areas. The development would pose a significant risk to both these areas and to the very inadequate drainage infrastructure in Calder Grove and Durkar. Increasing adverse weather events that see one in a hundred-year events happening once or twice in a decade, may well overwhelm any mitigation systems which would be catastrophic for adjoining communities.

The development would have a significant detrimental impact upon Wildlife both on the site and in the wider Calder Valley network.

The development would severely impact upon the rural identity and environment of both Calder Grove and the wider Parish of Crigglestone.

The open greenfield access to nature has been demonstrated as a crucial element in both individual and community wellbeing. This site gives an immediate visual access to nature and the countryside, together with a public footpath on the site.

This site is strong at fulfilling all five criteria of the Green Belt with a score of 32 and is grade 3 good agricultural land and should be retained to safeguard its **Permanence**.

This site is an essential part of the Green Belt Strategic Gap at its narrowest point between Horbury Junction Industrial complex and Calder Grove. Land use and Topography mean that it is the Broad Cut Farm site that dominates this strategic gap and provides both the 'Green' and most critically the 'Openness' of the Green Belt, (which can be clearly seen in the arial photograph). This site is, therefore, critical to the Green Belt Strategic Gap both in terms of protecting the existing very narrow gap and in providing the crucial element of the Green Belt...its **Openness**.

Strongly object.

Reason: The scheme is to increase traffic capacity and so increase the number of vehicles and the levels of Air Pollution. This will exacerbate the existing unacceptable poor levels.

This will increase the risk of mortality and ill health of residents of the Parish.

The scheme will also create yet another loss of amenity and disruption to residents for the benefit of developers.

Strongly object to the proposal to remove land from the Green Belt.

The Policy is not sound for the following reasons:

National Planning Policy

The Policy is not compliant to NPPF for Green Belts which sets out the need for **permanence** and that exceptional circumstances must be set out for development or removal of status, which cannot be done for this policy as the policy is not for land use in the Plan period.

Removal conflicts with its Strategic Green Belt essential gap status.

The land is rated as 'Strong Green Belt' with a score of 30 and fulfils all five purposes of the Green Belt.

There are no exceptional circumstances to remove the land from the Green Belt.

There are no exceptional circumstances for the removal of the site from the Green Belt as the land is not required in the Plan period. Similarly, there are no reasons why this site should be chosen over innumerable other potential locations. In view of the likely impacts of the Covid-19 pandemic, there needs to be a reassessment of requirements of what will be required in the much changed financial, economic, and social environment.

Local Plan and land use in the Plan period

The Local Plan should only set out land uses for the period of the Plan, the Safeguarded Status is at odds with this, as the land is for use in a period beyond. This therefore impacts on the permanence of the Green Belt and WMDC cannot put forward Exceptional reasons as the proposed use is not required in the Plan period and may alter. A preferable way forward would be for WMDC to bring forward any proposals for changes at the next update to the Local Plan. This protects the

permanence of the Green Belt, which is, the highest safeguard for the land and means that exceptional circumstances for removal will have to be made on the facts at the time.

This would include full impact assessments in relation to traffic, air quality, drainage, environment, climate change and carbon reduction, mortality and long-term health conditions, the impact on services including Schools and GP surgeries, community well-being and considering the views of the community and their representatives.

Air Quality

In view of the Air Quality Zone that covers much of Durkar there are exceptional reasons for it to remain Green Belt. Acting as an essential Green lung and preventing further increases in air pollution which exacerbate the existing very poor air quality. The nearest meter records levels of NO₂ at 38.2, which is very close to the legal limit of 40.

A public health report published in May 2014 revealed that the worst area for deaths from particle air pollution was Hull, at 5.9 per cent, closely followed by Rotherham and Wakefield at 5.7 per cent and Doncaster at 5.6 per cent. In Leeds and Sheffield, the figure was 5.5 per cent.

Unsustainable traffic levels.

The area already suffers from traffic saturation and this will become worse for the following reasons:

Other developments in Wakefield.

Continued development at Calder Park.

Housing development in Sandal.

Potential 300+ Housing development in Durkar.

Developments in north Barnsley and south Kirklees.

This development will only cause even greater problems.

Importance of local natural environment

The Covid-19 pandemic has highlighted time and again the vital importance of local green open space and environment in maintaining well-being and mental health of individuals and communities.

Not sustainable development

This is not a sustainable development proposal, one community (Criggleshole Parish) is bearing the brunt of environment destruction and increased pollution, with the resultant impacts upon mortality and long-term health conditions. The community is under incredible pressure from nearby commercial uses and the traffic that is generated, including that from south Kirklees and north Barnsley which use Jct 39 M1.

This is the second proposed largescale removal of land in the Parish of Crigglestone, following on from the large-scale removal of Green Belt land for the Calder Park development and over 250 houses in the last Plan.

According to the current Local Plan (2012), an average of 1,540 homes per year are being delivered, which is 50% more than the indicative contribution from WMDC under the new government guidelines of 1,033 homes per year.

The Ministry of Housing, Communities and Local Government figures show that 4,535 homes in Wakefield were empty at the most recent count in October 2019 – a seven-year high.

Flooding and drainage infrastructure

Adjacent areas are subject to flooding and the drainage infrastructure is not capable of sustaining this additional development.

Agricultural Land

This is grade 3 Agricultural land and should not be reclassified unless absolutely essential.

Wildlife and Environment

As this site is adjacent to the Pugneys Country Park and the Wildlife Reserve, this area is an intrinsic and connected part of the wider eco system of the Green Belt area. The removal of this site would have significant impact on the wildlife and eco system of the area, which cannot be put at risk.

Impact on the settings of Pugneys and Sandal Castle

This proposal will have a direct and significant impact on the setting of Pugneys Country Park. It will also have an impact on the setting of Sandal Castle, both from the castle and the views of the castle from Durkar Low Lane. This is a significant change in appreciating the skyline view.

Vital in protecting Rural identity.

This site provides the open Green Belt setting that is a key and intrinsic part of the rural identity of the historic community of Durkar. This is a fundamental issue in the protection of individual and community rural identity.

Parish Council vision for the wider area

The alternative Parish Council view is to enhance the Green Belt by promoting more tree planting, hedgerows, and habitats to encourage wildlife and carefully extending footpaths and bridleways to enable LOCAL access to the open land, to facilitate interaction with nature and the natural environment, to improve well-being in the unique setting of the Green Belt to the south west of Wakefield in the Parish of Crigglestone, which links to the wider West Yorkshire Green Belt beyond.

Volume 1 Development Strategy strategic and Local Policies

Soundness

Do you consider the Local Plan is sound?

No

Unsound

Do you consider the Local Plan is unsound because it is not:

(3) Effective

Reasons for compliance and soundness

Please give details of why you consider the Local Plan does not meet the requirements of the duty to co-operate, is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your comments.

VOLUME 1 POLICY LP 138 PUGNEYS LEISURE OPPORTUNITY AREA

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The above policies taken together with the WMDC intention to commercialise Pugneys Country Park, pose a severe threat to the fine balance between wildlife and nature conservation and the those of leisure and recreation. To maintain this balance there is a need to prevent the intensification of inappropriate commercialised development and uses that are traffic generating.

The context for Pugneys Country Park setting is as follows:

Whether standing at Sandal Castle and looking at the magnificent vista from the horizon and following the countryside and Green Belt as it sweeps down to the Calder Valley and follows the river round to Pugneys Country Park and the land between Durkar and Sandal or looking at a map, this is a unique topographical setting. This magnificent environmental asset should be cherished and protected to provide an essential 'Green Lung' to offset the damaging intrusion of the M1, traffic congestion and the resultant very poor air quality.

WMDC needs to work with the LOCAL Community representatives and organisations together with national and county wildlife and environmental bodies to develop a strategy that will protect and nurture this asset with levels of activity and use compatible with a Country Park and its local setting.

Crigglestone Parish Council view is to promote more tree planting, hedgerows, and habitats to encourage wildlife and carefully extending footpaths and bridleways to enable LOCAL access to the open land, to facilitate interaction with nature and the natural environment, to improve wellbeing in the unique setting of the Green Belt to the south west of Wakefield in the Parish of Crigglestone, which links to the wider West Yorkshire Green Belt beyond.

This would widen the Country Park and incorporate Sandal Castle as a key focus on the skyline and as an historical asset to be protected and enhanced.