



CRIGGLESTONE PARISH COUNCIL

Web site: www.crigglestonepc.org

Mrs Sarah Knowles – Clerk to Crigglestone Parish Council

Tel: 07419 585 227

Email: clerk@crigglestonepc.org

By post to
The Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

Submit comments online via
<https://appeal-planning-decision.service.gov.uk/comment-planningappeal/enter-appeal-reference>

24th October 2026

Dear Planning Inspectorate

BROAD CUT FARM - APPEAL REFERENCE APP/6014702

Outline Planning Application 24/01740/OUT

INTRODUCTION:

Crigglestone Parish Council is in the Rural Ward 18 of Wakefield Council. The total electorate for Crigglestone parish is 7646 as of 1st October 2026. It is made up of eleven villages and hamlets, including Durkar, Calder Grove and Crigglestone (which are the three villages most affected by the planning application).

The Parish Council has taken an active part in the Local Plan process from 2017, making submissions and representations at every stage, including the public hearings.

The Parish Council have consistently opposed this proposed development at every stage.

The Parish Council are making this submission to fully support the decision of Wakefield Council's Planning Committee at the hearing held 12th February 2026, to reject the above application

METHOD OF DEALING WITH THE APPEAL:

The Parish Council strongly endorse the Inspector's decision to hold a Hearing, as this method provides a level playing field for all interested parties. We explicitly oppose the developer's pressure to upgrade to a costly, adversarial Public Inquiry.

We respectfully request that the Inspector include a formal Peak-Hour Site Visit: (17:00-18:00) to Junction 39 M1, A636 Denby Dale Road, Denby Dale Road East, and Asdale Road.

HIGHWAYS AND TRAFFIC:

The Parish Council have commissioned a Report by APRICA Highway Consultants. This report sets out in detail a response to the Appellant's submission and why this appeal should be rejected and the decision of Wakefield Council Planning Committee be upheld.

It is Aprica's view, as evidenced, that there can only be one recommendation: outright refusal. This is evidenced above, and in the previous full Highway Assessment (Appendix A) by:

The severe lack of safe, practical sustainable travel measures, particularly for pedestrians who would be forced to use inappropriate crossings or cross without any protection (the above-mentioned 'Catch-22').

The intense HGV saturation within an already congested area with poor air quality and which is frequently gridlocked.

The documented geometric errors and safety hazards at the proposed highway junctions.

The contravention of multiple Policies:

- Policy LP27 (Part A) of the Wakefield District Local Plan 2036
- National Planning Policy Framework:
- 'Severe cumulative highway impacts' (Paragraph 116).
- Failing to prioritize sustainable active travel (Paragraph 114).
- Encroaching on protected Green Belt land (Paragraphs 154 and 155).
- Relying on poor "sealed box" acoustic design that fails to provide a high standard of residential amenity or resolve hostile land-use conflicts (Paragraphs 135f, 191, and 193)
- Exploitation and Breach of Policy SPA18 Wakefield District Local Plan 2036. The applicant relies heavily on the site's allocation under SPA18 to justify the principle of development, a Policy which explicitly demands adherence to a comprehensive masterplan, "streets for people" active design principles, and a strict thirty metre ecological buffer to protect the River Calder. Instead, the applicant has submitted a vague, non-binding 'indicative' framework which could not be further removed from the requirements set out in the Local Plan.
- The Applicant's persistent refusal to commit to binding off-site traffic mitigations.
- For the above reasons it is strongly recommended that this appeal be dismissed and planning permission refused outright.

Associated Air Pollution

This development will clearly exacerbate levels of morbidity and chronic health conditions associated with air pollution in all the adjacent communities and those exposed to the air pollution.

Air pollution contributed to the deaths of more than 2,500 people in Yorkshire in just one year, with emissions from road travel being the primary contributor.

A report from Public Health England estimates that long-term exposure to air pollution caused the deaths of 2,567 people in the County during 2010 and 25,000 nationwide.

The scale of the pollution adds up to 26,636 life years being lost in Yorkshire and was a factor in 5.3 per cent of adult deaths.

Wakefield was the third worst area for deaths in Yorkshire from particle (PM) air pollution at 5.7 per cent.

PM2.5 concentration in Wakefield is currently 2.7 times the World Health Organisation maximum annual air quality guideline.

The Co2 concentrations are also more than 2.5 times the World Health Organisation maximum annual air quality guideline.

Associated Traffic Noise

Highways England recognised that there were existing levels of Noise pollution affecting communities adjacent to Junction 39-M1. They erected sound barriers, but unfortunately the net effect appears to be minimal if any change.

The Planning Application fails to comply with NPPF Policy E3.3(d) (The Sealed Window Test): Policy E3.3(d) The applicant's shift to open B8 use forces the application to be scrutinized under the specific baseline criteria of Policy E3.3(d), which mandates that freight infrastructure must completely protect residential environments. There is no such protection for existing residents of Calder Grove and Durkar.

Unreasonable Mitigation: Wakefield Council Environmental Health Officers have already conceded a critical vulnerability: future residents next to the main road will be physically unable to open their windows due to noise, and children will be blocked from playing in gardens.

The Proximity Paradox: National Planning Practice Guidance (PPG) dictates that planning conditions must be reasonable. Forcing residents to live inside a permanently sealed envelope reliant entirely on mechanical ventilation (MVHR) just to survive 24/7 heavy vehicle movement is legally unreasonable. Because the 14.13-hectare developable footprint is too small to provide physical buffer zones, the layout fails Policy E3's mandatory environmental compliance gates.

The proposed development both at construction and use will generate considerable additional levels of noise which is completely unacceptable to communities already suffering from noise pollution.

THE APPELLANT'S STATEMENT OF CASE:

The Appellant's Statement of Case is highly misleading. By omitting the 'Advanced Manufacturing' mandate explicitly specified within Local Plan Policy SPA18, and instead applying for an unrestricted B8 Use Class, the applicant is seeking an open-ended permission to operate a heavy freight and distribution base. Because this open B8 classification introduces continuous 24/7 HGV noise and pollution, the application must be heavily scrutinised against the new August 2026 NPPF Policy E3. The technical evidence confirms the site completely fails Policy E3.3(d); it cannot realistically manage or mitigate its acoustic impacts without forcing adjacent residential properties to live behind permanently sealed windows. This extreme mitigation confirms that an unrestricted storage and logistics use is physically and environmentally incompatible with the co-allocated C3 housing component on this constrained 14.13-hectare site.

Other matters that should be considered are as follows:

DEPARTURES FROM THE LOCAL PLAN:

This Planning Application is not only a departure from the Local Plan but a direct challenge to the purposes of that Plan. The reasons the application should be rejected are set out below:

Contrary to Special Policy Area SPA18.

Special Policy Area SPA18 states that it 'will be developed to include an Advanced Manufacturing Park' as part of a policy to increase business productivity, create good quality

jobs and future-proof the economic base of the district. The intention of the Local Plan is, therefore, not to allow or encourage any form of job creation. Instead, the intention is to encourage jobs that enhance the economic base of the district.

There is no evidence in the application that they are taking the slightest regard to the Local Plan requirements.

The application is quite clearly contrary to the purposes set out in the SPA Policy. The Developer has been promoting the site as a conventional Warehousing, Logistics, and Industrial Estate, which are uses that the Local Plan does not want to allow or encourage. So, the application is a direct challenge to a key economic policy of Wakefield Council.

The applicant's own consultant suggests that the application will not promote Advanced Manufacturing! Indeed, SPA18 states that the exceptional reason the site was removed from the Green Belt was for the specific economic function of Advanced Manufacturing to deliver the wider economic policy.

This SPA is therefore specifically to avoid or encourage more of the same development that would not enhance the economic base of Wakefield.

This application is a direct challenge to SPA18 and the wider economic policy of Wakefield Council.

Contrary to the reasons given for the removal of the site from the Green Belt.

SPA18 states that the exceptional reason the site was removed from the Green Belt was for the specific economic function of Advanced Manufacturing to deliver the wider economic policy.

During the Local Plan process, the Developer/Agent made representations and submissions that stated there was a pressing need and demand for Advanced Manufacturing in Wakefield. It is therefore exceptionally strange that the Developer has been promoting this site, not for Advanced Manufacturing, but for conventional warehousing and logistics that are quite contrary to SPA18 and the wider economic policy.

Indeed, the Applicant has refused to provide a definition of Advanced Manufacturing to Crigglestone Parish Council!

We were also told that only this site of all the sites in Wakefield District was suitable. This view has been consistently disputed by the Crigglestone Parish Council and Wakefield Civic Society. It is too small and too constrained.

We were also told that one of the reasons it had to be this site was its location between Leeds, Sheffield and Huddersfield Universities, as they would be playing a significant role in the Development of Advanced Manufacturing on the site. There is no evidence in the application and enquiries undertaken by the Parish Council of any such involvement.

This application is quite contrary to the reasons the site was removed from the Green Belt and the representations and submissions made during the Local Plan process. This is an extremely serious matter.

Contrary to the Requirement for a Landscape led campus style Development.

The Local Plan Development Brief in Volume 2 of the Local Plan repeats the 'requirement' that Broad Cut Farm will include an Advanced Manufacturing Park. Broad Cut Farm is the only

development in the Local Plan which specifies that any application must deliver a 'high-quality landscape led campus style environment,' which, by its nature, would mean a lower density of construction.

The requirement for a high-quality landscape led campus style development is completely absent from the application. This is because the application is led by the desire to erect as cheaply as possible a standard high-density warehousing/logistics development with minimal landscaping.

The application for a phased development will result in piecemeal uncoordinated development, which is utterly opposed to the requirement of the Local Plan.

The Application could not be further removed from the requirements of the Local Plan.

Contrary to the Special Policy Area SPA18 Site Boundary.

The site boundary of the application is a major departure from the Local Plan. It incorporates the long-standing Green Belt to the north of the Local Plan Policy SPA18 site boundary, which is designated as a Leisure Opportunity Area.

The applicant has made a representation that this is 'compensatory Green Belt'; clearly this is utterly specious.

Contrary to the Requirement of the Planning Inspector for a 30m Buffer Zone.

The Planning Inspector made the following remarks at the Local Plan process in respect of Broad Cut Farm and a 30m Buffer Zone between the development and the River Calder:

(295) "This [acceptance] is subject to a modification to clarify that the 30-metre buffer zone is required unless further ecology work supports an alternative approach (MM2.27). This is necessary for the policy to be justified."

Contrary to the use of Public Footpaths and the Local Plan Leisure Opportunity Linkages.

This application and associated engineering and earthworks represent a threat to the public footpath on the south bank of the River Calder/Canal. This is contrary to the Wakefield Council's Leisure policies which seek to enhance the Leisure Opportunities along the River Calder/Canal corridor and create strong links to Pugneys Country Park.

It is highly likely that the footpath will be obliterated or mainly underwater. Either way, a public right of way will be rendered inoperable. The applicant has undertaken no processes to close a public footpath.

The application is highly damaging to Leisure Policies and public footpaths.

LEGAL AND PROCEDURAL ISSUES:

Inclusion in the Local Plan was not legally valid.

The Parish Council believe that there was no legal right to include the site as it was misnamed and improperly located up to the Local Plan Inquiry, including the 8th October 2019 Cabinet recommendation and the 16th October Full Council decision to include in the Local Plan.

The site was referred to as Land at Jct 39 M1 Durkar, Wakefield. When clearly the site is Broad Cut Farm, Calder Grove, Wakefield. Other documents have also referred to the location as Calder Park, Durkar!

Failure to follow Consultation Procedures and Policy.

The Parish Council believe that the proper process for consultation with both the public and Ward Councillors was not followed. The site was brought in halfway through the Local Plan process, with no consultation undertaken

Failure to undertake a Technical Assessment prior to inclusion in the Local Plan.

No Technical Assessment undertaken prior to inclusion in the Local Plan.

Legal and Procedural issues in relation to Planning Conditions.

The Parish Council would suggest that 91 Planning Conditions demonstrate that this application was brought before the Planning Committee prematurely.

We highlight the following major concerns:

1. Unlawful Deferral of Environmental Assessments (Ex p Hardy Violations): Key conditions (specifically 25, 55, and 91) attempt to defer baseline ecological, water environment, and wind hazard assessments to post-consent stages. This breaches Environmental Impact Assessment (EIA) Regulations and established case law.
2. Breach of August 2026 NPPF Guidance on Planning Conditions: The schedule suffers from extreme "condition bloat" (over twenty-five pre-commencement conditions) and duplicates non-planning statutory regimes (Building Regulations), failing the statutory Six Tests.
3. Prematurity of Site Parameters: The sheer volume of post-permission controls.

Wind Tunnelling

This issue clearly is an issue affecting the Strategic Highways in the vicinity of the application site. The Parish Council have raised this matter previously (See Appendix A).

Condition 91 (Wind Microclimate Hazards on the M1 Strategic Road Network):

- o The Defect: Defers wind hazard impact assessments on the M1 highway to Reserved Matters.
- o Why it fails legally: Wind shear and turbulence caused by large commercial scale/massing near a strategic motorway go to fundamental highway safety and site layout. Following *R (Swire) v Canterbury CC* [2022], parameter plans established at outline control future development; deferring structural wind hazard modelling risks approving parameter envelopes that cannot safely accommodate required mitigation.

CONCLUSION:

Not only is the application utterly at odds with Policy SPA18, but it is also contrary to all the other Local Plan Policies and Objectives set out above. It is a direct threat to the Council's economic policy. It also completely ignores the requirement of the Planning Inspector.

The applicant's overarching strategy is to secure outline consent with as little upfront cost and commitment as possible, with the most severe and dangerous compromises occurring in traffic and highway safety:

- **Flawed Traffic Engineering and Unresolved Safety Hazards:** The submitted General Arrangement drawings propose right-turn lanes into the site that fail to meet standard deceleration and taper lengths based on verified 85th percentile speeds, risking immediate bottlenecks and rear-end collisions on the A636. See previous Highway Assessment, at Appendix A, for full details.

Furthermore, an independent Stage 1 Road Safety Audit (RSA1) identified twelve major safety flaws, including aquaplaning risks on the Durkar Interchange, missing tactile paving for the visually impaired, and low tree canopies risking cyclist head injuries. Astonishingly, the designer accepted these errors but defers correcting them to a future detailed design phase, whilst actively refusing to provide a recommended safe pedestrian footway on the south side of Denby Dale Road. For a development of this size and position, the Developer could have explored grade-separated active travel infrastructure such as dedicated pedestrian and cycle footbridges. Mentioning a footbridge would demonstrate at least some effort by the Developer to fund possibly the only way to safely connect a new residential and commercial population of this size to the wider Durkar community without exposing them to sustained poor air quality and fast-moving motorway slip traffic. Instead of at least mentioning such infrastructure, even as a possibility, the Developer has opted for the cheapest, most hostile compromise possible - forcing vulnerable pedestrians and cyclists across multiple live traffic lanes via circuitous, at-grade crossings. A bridge or bridges would also help to ameliorate the guaranteed further congestion and pollution of stop-start traffic.

- **Unmitigated Gridlock and HGV Saturation:** The developer attempts to downplay the physical reality of construction and operational traffic. Site preparation alone requires the export of 23,500 cubic metres of topsoil, generating 2,000 HGV movements onto the local network - a disruption the developer dismisses as "negligible" based entirely on an unwritten, future CTMP. Furthermore, National Highways' proposed conditions introduce a severe loophole, allowing up to sixty-five dwellings or 5,000 square metres of commercial space to be occupied and generating traffic before the major strategic mitigation works at Junction 39 are even completed.

- **Hostile Active Travel Environment:** Rather than safely connecting the site to the community, the scheme proposes isolated, shared footway/cycleways that directly violate the core principles of Local Transport Note 1/20 (LTN 1/20). Pedestrians are expected to navigate a highly hazardous, multi-lane, circuitous crossing at the M1 Durkar Interchange, exposing users to severe air pollution. In terms of crossing points there is a clear 'Catch-22' situation – adding crossing points would inevitably lead to even more congestion on an already gridlocked network (see full Highway Assessment at Appendix A), yet failing to provide them would leave pedestrians highly vulnerable. There is no possible solution to this problem.

- **Evasion of Sustainable Travel Mitigation:** The Framework Travel Plan is a hollow document that accepts a dismal 76% residential and 70% employment car dependency rate. It promotes the highly unreliable, hourly X1 bus service as a realistic alternative to driving, ignoring documented public transport failures. Worse still, the developer explicitly refuses to fund site-wide Travel Plan management post-construction, completely abandoning the enforcement of sustainable travel targets to a fragmented group of future

occupiers with a short-sighted five-year cut-off. A development so close to the Motorway network, which proposes measures heavily weighted towards carrying more vehicles, rather

than encouraging sustainable travel, is sure to encourage use of the car whilst discouraging walking, wheeling, cycling, or bus use.

This application could not be further removed from the requirements set out in the Local Plan for the Broad Cut Farm site.

For all the above reasons, **THE APPEAL SHOULD BE REFUSED.**

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Knowles'.

Mrs Sarah Knowles, Clerk/RFO

For and on behalf of Crigglestone Parish Council

Enc:

Appendix A – Further objection on Wind Tunnelling grounds to WMDC Planning Case Officer Sarah Westwood



CRIGGLESTONE PARISH COUNCIL

Web site: www.crigglestonepc.org

Mrs S Knowles – Clerk to Crigglestone Parish Council

Tel: 07419 585 227

Email: clerk@crigglestonepc.org

3rd February 2026

Dear Sarah Westwood,

Please accept this correspondence as a further objection from Crigglestone Parish Council to Outline Planning Application 24/01740/OUT - Broadcut Farm

WIND TUNNELLING TESTS

Background

Crigglestone Parish Council (CPC) has noted the submission from National Highways dated the 12th January, which included reference to the concerns and potential impact of wind tunnelling and a recommendation that 'the LPA would need to satisfy themselves (on the issue of wind tunnelling) as part of the planning process.'

The CPC latest objection, including the report from Aprica Ltd and HD Consulting, also refer to this issue and quote from the National Highways statement: 'They (the public) have raised concerns with National Highways about the potential for wind tunnelling due to perceived cross winds and the introduction of buildings immediately adjacent to the SRN.'

The M1 is open and exposed in this location, crossing the southern bluff line of and the River Calder. The prevailing westerly winds are funnelled down the Calder Valley. Some of the highest wind speeds in England have been recorded at Emley Moor, which is under ten miles away. Whilst the major impact and potential danger is likely to be on the north bound section of the M1, impact across the whole Motorway cannot be discounted, or those affecting the A636 and the areas adjacent to the M1 in Calder Grove and Durkar.

As the Bridgewater Place development in Leeds as tragically proved, there can be fatal consequences, when there have been no rigorous wind tunnelling tests, prior to any planning application.

Main Issues of Concern

A single building can create this type of danger and consequences, whilst it is possible that a single building may create similar consequences to Bridgewater Place, it is also possible that the totality of proposed buildings on this site, may provide the greatest chance of creating the following:

- Wind tunnelling compressed blasts between buildings.

- Wind deflection to the flanks of the development with compressed blasts in these locations; this has even greater risk and danger as it will happen where there are two bridges on the M1, one over the River Calder and the other over the A636.
- Wind eddies creating turbulent wind, which would then drop on to the M1, this may cause more problems and danger on the southbound lanes of the M1.

Clearly, it would be entirely unacceptable to end up with a situation where the proposed development at Broad Cut Farm resulted in a similar situation to that at Bridgewater Place, which would result in the tragic loss of life and the closure of the SRN in this instance.

Both the LPA and the NH have a duty of care to ensure the safety of road users. The Local Authority has additional duties to ensure the safety of residents and property and those passing through from the impacts of their decisions. The NH have a Statutory Duty to ensure the safety of road users and the efficient functioning of the SRN.

Timing of the First Independent Rigorous Wind Tunnelling Test

That is why it is essential that a rigorous and independent test is undertaken prior to any planning decisions, under the specifications set out below. It is the only way to ensure that a tragedy like Bridgewater Place is not repeated at Broad Cut Farm.

Conditions for Independent and Rigorous Testing

We would suggest that the only way that these issues can be examined and a conclusion reached is for the Developer/Agent to submit a detailed Master Plan application showing how the Campus Style Advanced Manufacturing Park is to be delivered in accordance with the Local Plan.

The LPA in consultation with the NH should commission from a leading organisation in this field a detailed and rigorous Wind Tunnelling Test (to be paid for by the applicant). It is essential that this is an independent test, under the control of the LPA and NH to ensure a rigorous and independent focus on danger, safety, and risk, in particular:

- The safety of road users on the SRN.
- The safety of road users and pedestrians on the A636.
- The safety of road users and pedestrians on local feeder roads within 440yds of either side of the M1 in this location.
- The safety of residents and property and people passing through within 440 yds of either side of the M1 in this location; to ensure they are not exposed to greater danger, risk, or nuisance than those under existing wind conditions that are experienced.

The minimum criteria to be considered in the testing would be:

- Building location and floor area.
- Building orientation.
- Building heights and heights in relation to the M1 running surface.
- Building distance from curtilage of M1.
- Associated structural and earthwork proposals.
- Wind speed (from 20mph to 150mph).

- Wind direction.
- Any other factors deemed relevant by the Professionals undertaking the tests.

Clearly, any changes to the above criteria and dimensions by the applicant would require a full retest to ensure rigorous and independent assurance regarding all the aspects set out above.

Yours sincerely



Mrs Sarah Knowles
Clerk/RFO on behalf of Crigglestone Parish Council