

**Flood Risk Assessment
and Drainage Strategy**

**61-65 New Street
Huddersfield**

For

SA Associates

Report ref	Issue	Prepared by	Reviewed by	Date
21-002-GLM-00-XX-RP-C-9000	1	J Mitchell	L Ogden	June 2021

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and Drainage Strategy**

**61-65 New Street
Huddersfield**

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1 INTRODUCTION

1.01 This report is commissioned by SA Associated to examine the flood risk and drainage issues associated with the proposed redevelopment of 61-65 New Street, Huddersfield.

1.02 The objectives of this assessment are to identify any potential risk of flooding to the proposed development and any risks to the adjacent properties as a result of development, in accordance with the requirements of the National Planning Policy Framework (NPPF) and its associated Technical Guidance. It will also assess the surface and foul water drainage proposals to ensure the development does not increase the risk of flooding elsewhere.

1.03 This report is based on the following information:

- Site topographic survey, undertaken by Met Geo Environmental, dated July 2020
- Kirklees Council pre-planning application response, dated 4th December 2020
- Calder Catchment Strategic Flood Risk Assessment, dated July 2016
- Environment Agency Online Flood Mapping
- Online MAGIC Mapping
- Online Ordnance Survey (OS) Mapping

1.04 This report presents the factual information available during the time of appraisal, interpretation of the data obtained and recommendations relevant to the scope of works. It has been assumed in the production of this report that the site is to be redeveloped for residential and commercial/retail end use.

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2 SITE LOCATION, TOPOGRAPHY AND PROPOSED DEVELOPMENT

Site Location

2.01 The site occupies No's 61-65 New Street, Huddersfield and lies on the junction of the pedestrianised New Street and Albert Yard. The site postcode is HD1 2BQ and is located at OS grid reference 414449, 416490.

2.02 The site forms part of a terrace of retail premises located on a principle shopping street and within Huddersfield Town Centre Conservation Area. The building is presently un-occupied with the ground and basement floor retail units being recently vacated. The upper floors are also un-occupied. The current ground floor layout is presented within **Appendix A**.

2.03 The site is bound on all sides by retail units to ground floor with office and residential uses to upper floors. The adopted and pedestrianised highways of New Street and Albert Yard bound the western and northern frontages of the site respectively.

2.04 The basement level is set between approx. 89.00m and 89.70m AOD with the ground floor located between approx. 91.80m and 92.70m AOD. Upper floors are typically set at 95.10m and 98.20m AOD.

2.05 New street is relatively level at 91.50m fronting the site with Albert Yard falling from New Street in an easterly direction to a level of 88.37m at the western end of the building.

Proposed Development

2.06 Development proposals include the redevelopment of the existing buildings to create 3no new retail units at ground and basement level plus conversion of existing spaces to form 40no new 1 and 2 bedroom apartments. The development will seek to create 3no new storeys of development over the existing building. Detailed floor plans and elevations are presented within **Appendix B**.

3 EXISTING WATERCOURSES AND DRAINAGE

Existing Watercourses

3.01 The nearest Main River to the site is the River Colne, located some 500m to the south west of the site. There are no ordinary watercourses located any closer to the site than the main river.

Public & Private Drainage Networks

3.02 Yorkshire Water sewer asset plans have not been requested but it is anticipated both surface and foul water sewers are located within both New Street and Albert Yard.

3.03 The site is currently drained via traditional gutter systems and rain water downpipes into the existing sewers within Albert Yard. No attenuation tanks or flow control chambers are present within the existing development. Foul water is also taken into sewers within Albert Yard.

Private Drainage Network

3.04 A CCTV survey of the existing drainage systems, including internal surface and foul water connections, will be undertaken in prior to works commencing to confirm all existing outfalls.

4 FLOOD ZONES & RISK TO THE PROPOSED DEVELOPMENT

4.01 All sources of flooding have been reviewed including fluvial, sea, surface water, groundwater, sewer and artificial sources.

Fluvial & Tidal Flooding

4.02 The EA Flood Zones refer to the probability of river and sea flooding. The mapping does not take account of the possible impacts of climate change, or the presence of flood defences. Flood Zone definitions are set out in the National Planning Policy Framework (NPPF) as the following:

- **Flood Zone 1:** Land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
- **Flood Zone 2:** Land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.
- **Flood Zone 3:** Land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

EA Flood Map for Planning

4.03 The EA Flood Map for Planning confirms the site is located within Flood Zone 1. The Flood Map for planning is presented within **Appendix C**.

LLFA Information

4.04 The Kirklees Council SFRA mapping confirms the Flood Zones shown on the EA Flood Map for Planning, that the site is located wholly within Flood Zone 1, low risk.

4.05 A pre-planning consultation was sent to Kirklees Council on the 25th August 2020 with a response received on the 4th December. The consultation response included

comments from the councils Flood Risk and Drainage Team. The response confirms the above flood zone allocation and also confirms that their surface water flood risk maps reveal no areas of concern. The response also indicates there are no reports of historical flooding in the immediate vicinity of the development.

4.06 The site is located within Flood Zone 1 and is not within proximity to either a fluvial or sea flooding source. Therefore the risk of flooding from Main Rivers and Sea is considered to be very low.

Flooding from Ordinary Watercourses

4.07 There are no ordinary watercourses located within the site or to its local proximity. Therefore, the risk of flooding from this source is considered to be negligible.

Surface Water Flooding

4.08 Surface water flooding occurs when the amount of rainfall exceeds the drainage or infiltration capacity of the surface it falls upon. Surface water runoff can coalesce into surface water flow pathways, especially in urban areas where there is a large proportion of impermeable ground surface due to development, as it flows towards a drainage system or watercourse. Surface water can also pond within areas with inadequate drainage. The Environment Agency has worked together with Lead Local Flood Authorities who deal with surface water flooding to produce Updated Flood Map for Surface Water mapping which places areas at risk of flooding from surface water into the following categories:

- **High risk:** The area has a chance of flooding of greater than 1 in 30 (3.3%) each year.
- **Medium risk:** The area has a chance of flooding of between 1 in 100 (1%) and 1 in 30 (3.3%) each year.
- **Low risk:** The area has a chance of flooding of between 1 in 1000 (0.1%) and 1 in 100 (1%) each year.
- **Very low risk:** The area has a chance of flooding of less than 1 in 1000 (0.1%) each year.

4.09 An extract of the Updated Flood Map for Surface Water mapping is shown within **Figure 1**. The site has a 'low' risk of surface water flooding with flood depths of below 300mm and flow velocities less than 0.25m/s.

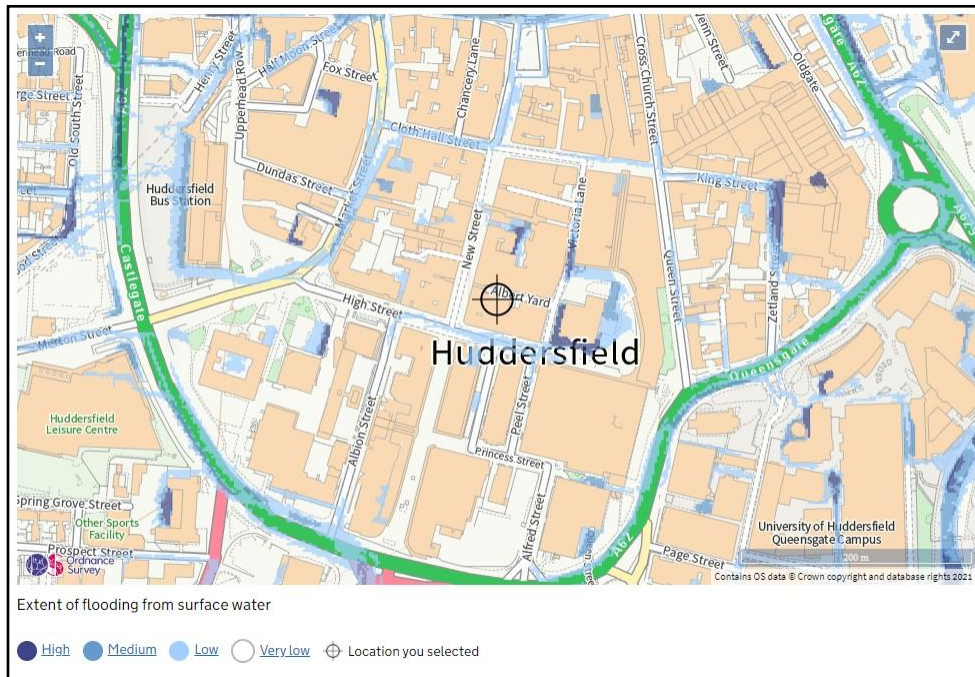


Figure 1: Extract of Updated Flood Map for Surface Water mapping

Flooding from Artificial Sources

4.10 The EA Long Term Flood Risk Mapping has been reviewed to determine the risk of flooding from artificial sources such as reservoirs, canals or flood defences. These maps will show any areas of potential risk of flooding due to failure of such structures.

4.11 The site is not within the mapped extent of flood risk from artificial sources. Therefore, the risk of flooding to the site from this source is assessed as negligible.

Groundwater Flooding

4.12 Another potential risk of flooding to be considered is from rising groundwater within the underlying strata.

4.13 The Kirklees SFRA includes a simple map of areas susceptible to ground water flooding. The site is shown to be located within an area of low risk of groundwater emergence, <25% chance.

4.14 However, it should be noted that no new basement areas are being created as part of this development proposal, only existing spaces are being utilised. No evidence of ground water flooding is visible within the current basement structures but ongoing monitoring will take place throughout the redevelopment.

4.15 As no new basements are proposed with the development, and no historical groundwater flooding has been noted, the site is assessed as being at low risk of groundwater flooding.

Sewer Flooding

4.16 A further possible source of flooding is from artificial drainage systems and the public sewers. Sewers may be at risk of flooding during times of heavy rainfall, which can cause sewers to surcharge.

4.17 Existing public sewers are noted within both New Street and Albert Yard. In addition the pedestrianised section of New Street is drained into these sewers via large slot drainage channels located to the immediate building frontage. Roof water downpipes are located along Albert Yard to the sites northern elevation.

4.18 Given the existing falls along both of the adjacent streets, any localised flooding from the public sewer network will be conveyed to the east and south within the adopted highway channels. This is further confirmed by the absence of any surface water flooding on the surface water flood map shown in **Figure 1**.

4.19 Therefore, the risk of flooding to the site from this source is assessed as low.

Table 1: Summary of flood risks from all sources

Flood Risk Classification					
Flood Risk Source	High	Medium	Low	Very Low	Negligible
Main Rivers				✓	
Sea				✓	
Ordinary Watercourses					✓
Surface Water			✓		
Artificial Sources					✓
Groundwater			✓		
Sewer			✓		

4.20 Based on **Table 1** above, no new mitigating measure are required to manage flood risk at the site. However, monitoring of ground water issues should be undertaken during the re-development phase to ensure any existing protection is maintained or replaced where necessary. Any existing measures, such as possible tanking or non-return valves fitted to drainage pop-ups, should be maintained.

5 SURFACE AND FOUL WATER DRAINAGE

Surface Water Drainage

5.01 In line with the NPPF, the aim of any new development should be to discharge surface water run-off from the site in accordance with the below surface water drainage hierarchy;

1. Into the ground (infiltration)
2. To a surface water body
3. To a surface water sewer, highway drain or another surface water system
4. A combined water sewer.

5.02 The proposed development is situated within a town centre location with no significant external areas in which infiltration systems could be located. Any new soakaways would need to be located at least 5m from any existing or proposed structure; this is not feasible given the proposed site layout. Furthermore, the presence of the existing basement properties could lead to an increased flood risk from this source and, as such, infiltration drainage methods are not considered suitable.

5.03 There are no existing watercourses within, or adjacent to, the site into which new surface water run-off could be discharged.

5.04 As such, the proposed development should be drained into the existing drainage systems within New Street and Albert Yard.

Surface Water Discharge Rate

5.05 The proposals seek to partially demolish and rebuild with an unchanged building footprint and impermeable area. As such, there will be no increase in surface water run-off rates or volumes over the existing development.

5.06 Given the physical site constraints, including available space at ground floor, basement properties and the existing foundation layout, it is not considered possible to site any below ground attenuation tanks within the development boundary. As such, the existing

peak run-off rates will be maintained and the development cannot provide the typical 30% betterment requested by the Local Plan Policy LP28. This is acknowledged in the pre-application response included in **Appendix D**.

5.07 Existing drainage connection points, such as gullies, channels and rain water pipes should be maintained and re-used. A full CCTV drainage survey will be required to confirm these outfall points and their current condition. Any damaged sections should be replaced/repaired as necessary prior to occupation.

Surface Water Treatment

5.08 Sustainable Urban Drainage Systems (SuDS) should also be used wherever possible to mimic as far as practicable the natural run off regime, improve water quality, reduce run-off volume and attenuate peak flows. These should be designed in accordance with the current guidance, The SuDS Manual (CIRIA C753).

5.09 Given the existing site constraints, these features could be difficult to incorporate within the proposals. However, **Table 2**, below, presents potential SuDS features that should be considered for the site at the detailed design stage.

Table 2: SuDS components feasible within the site and associated benefits:

SuDS Component	Water Quality	Biodiversity	Amenity
Living/Green Roofs	✓	✓	
Rainwater Harvesting (water butts)			✓
Rain Gardens (planter areas)		✓	✓

Maintenance Regime

5.10 Maintenance and inspection of any SUDS features should comply with the SUDS Manual (CIRIA C753) and will be undertaken by a private maintenance company.

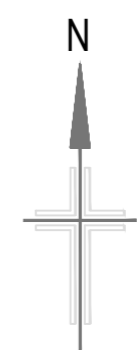
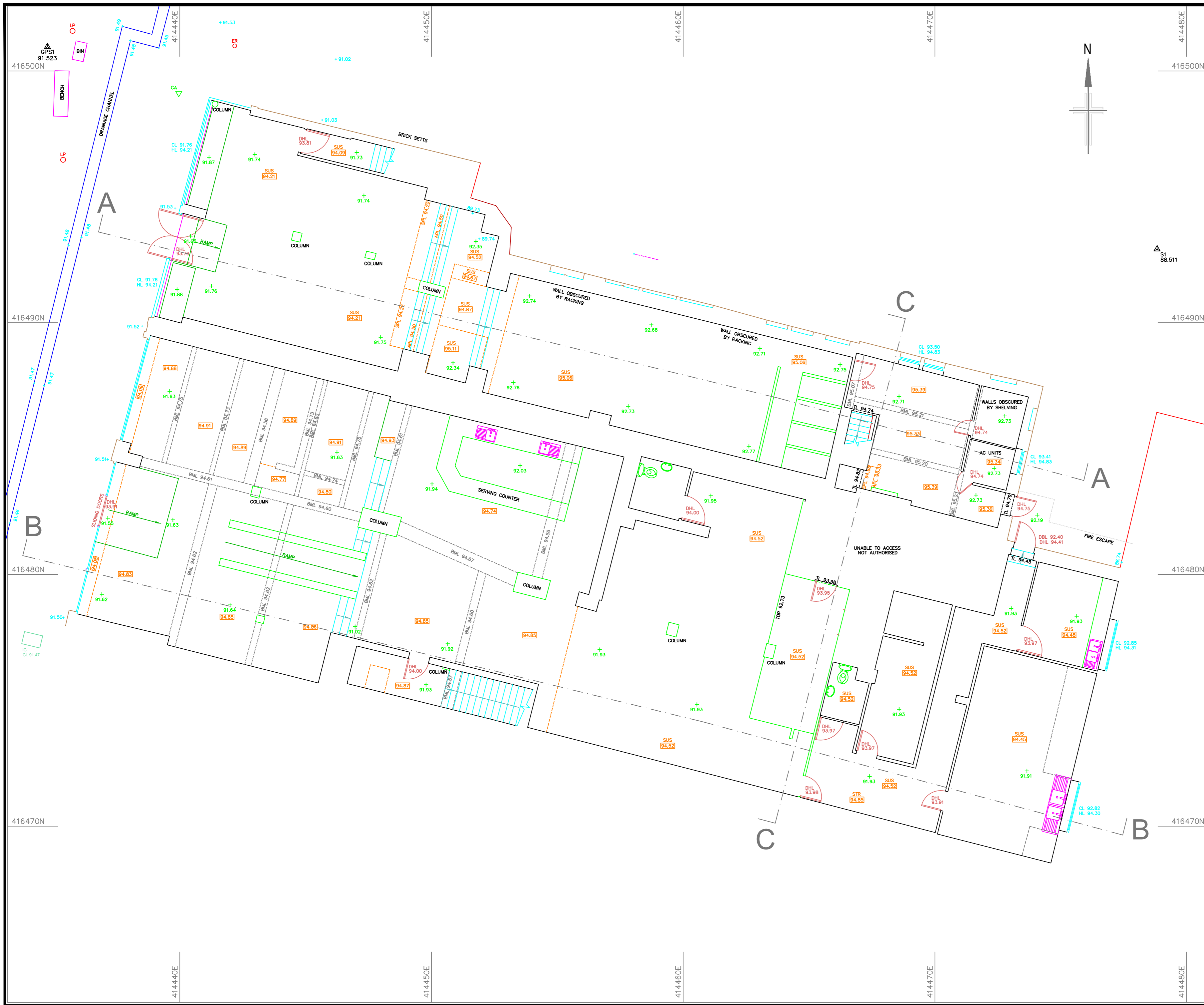
Foul Water Drainage

5.11 Foul water drainage from the existing and proposed units will discharge into the existing soil vent pipes and stub stacks already present on site. Any new connections should utilise the existing off-site connections into the adjacent adopted sewer system. It is understood that all existing foul water drains discharge into Albert Yard to the north east and head in a south easterly direction away from the site.

5.12 There is no evidence of any existing flooding or capacity issues on this system but a full CCTV drainage survey will be required to confirm these outfall points and their current condition.

Appendix A

Topographical Survey
Ground Floor Plan



Notes
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Grid : OS National Grid.
 Using the OS GPS Network and applying OSTN15 transformation and then removing the scale factor for true distances with a one-step transformation centred on GPS1

Datum : OS Level Datum.
 Using the OS GPS Network and applying OSGM15 National Geoid Model to obtain local area corrections.

KEY

CEILING	FLOOR TO CEILING HEIGHT	WINDOWS	FLOOR TO CILL
(2.22)	FLOOR TO CEILING HEIGHT	F-C 1.43	FLOOR TO CILL
32.98	CEILING LEVEL	C-H 2.29	CILL TO HEAD
APL 32.98	APEX LEVEL	C-SPR 1.43	CILL TO SPRING
SPL 32.98	SPRING LEVEL	C-APX 2.29	CILL TO APEX
APX 2.98	FLOOR TO APEX	CL 22.84	CILL LEVEL
SPR 2.02	FLOOR TO SPRING	HL 24.76	HEAD LEVEL
SUS	SUSPENDED CEILING		

BEAMS	FLOOR TO U/S OF BEAM	FLOORS	FLOOR LEVEL
BMH 3.52	FLOOR TO U/S OF BEAM	+ 116.12	FLOOR LEVEL
BML 32.16	LEVEL TO U/S OF BEAM		
HAPL 33.26	LEVEL TO APEX OF BEAM HAUNCH		
HSPL 32.95	LEVEL TO SPRING OF BEAM HAUNCH		
PUR 32.95	LEVEL TO U/S OF PURLIN		

DOORS	FLOOR TO U/S OF DOOR FRAME	OTHER	TOP OF WALL LEVEL
DH 2.67	FLOOR TO U/S OF DOOR FRAME	TOW 31.23	TOP OF WALL LEVEL
DHL 33.45	U/S OF DOOR FRAME LEVEL	AH	ACCESS HATCH
		↑	STAIRS UP

Rev	Date	Drawn	Description	Check
-	-	-	-	-

Southgate House
 Pontefract Road T: +44 [0] 1132 008 900
 Stourton F: +44 [0] 1132 008 901
 Leeds E: admin@metgeoenvironmental.com
 West Yorkshire W: www.metgeoenvironmental.com
 LS10 1SW

Client
 ACUMEN DESIGNERS & ARCHITECTS

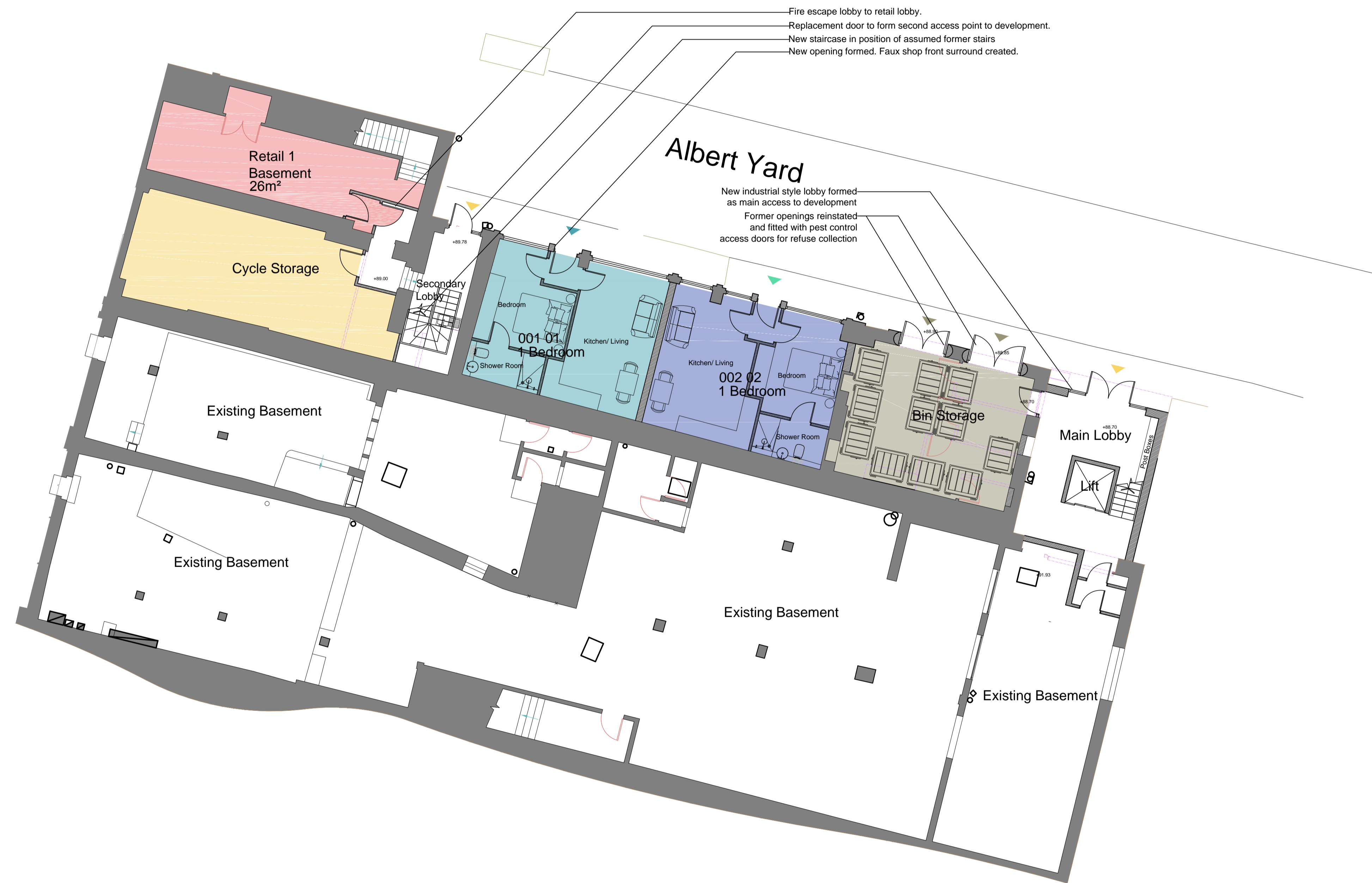
Site
 61-65 NEW STREET
 ALBERT YARD, HUDDERSFIELD, HD1 2BQ

Title
 GROUND FLOOR PLAN

Surveyed	JM BH	Drawn	BH				
Check	DA	Date	15/07/2020				
Scale	1:100	Job No	P20-00712				
		Sheet Size	A2				
		Rev	01				
DWG Ref	Project Number Origin Zone Level Desc Type Role Sheet						
P20-00712	MET	INT	G	FP	M2	B	001

Appendix B

Proposed Floor Plans
Basement, Ground & Floors 1 - 6



DO NOT SCALE OFF THIS DRAWING

rev	description	drawn	auth	date
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acumenarchitects.co.uk 01484 546 000
Headrow House, Old Leeds Road, Huddersfield, HD1 1SQ

Client: SA ASSOCIATES

Project: 61-65 NEW STREET
HUDDERSFIELD

Project No	Drawing No	Rev
2655	(100)20	/

Description: PROPOSED BASEMENT FLOOR PLAN

Scale	Date Drawn	Drawn By	Authorised By
1:200 @ A1	MAY'21	JF	JC

Purpose of Issue: Planning Building Regs Tender Contractor Comment Info



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rev	description	drawn	auth	date



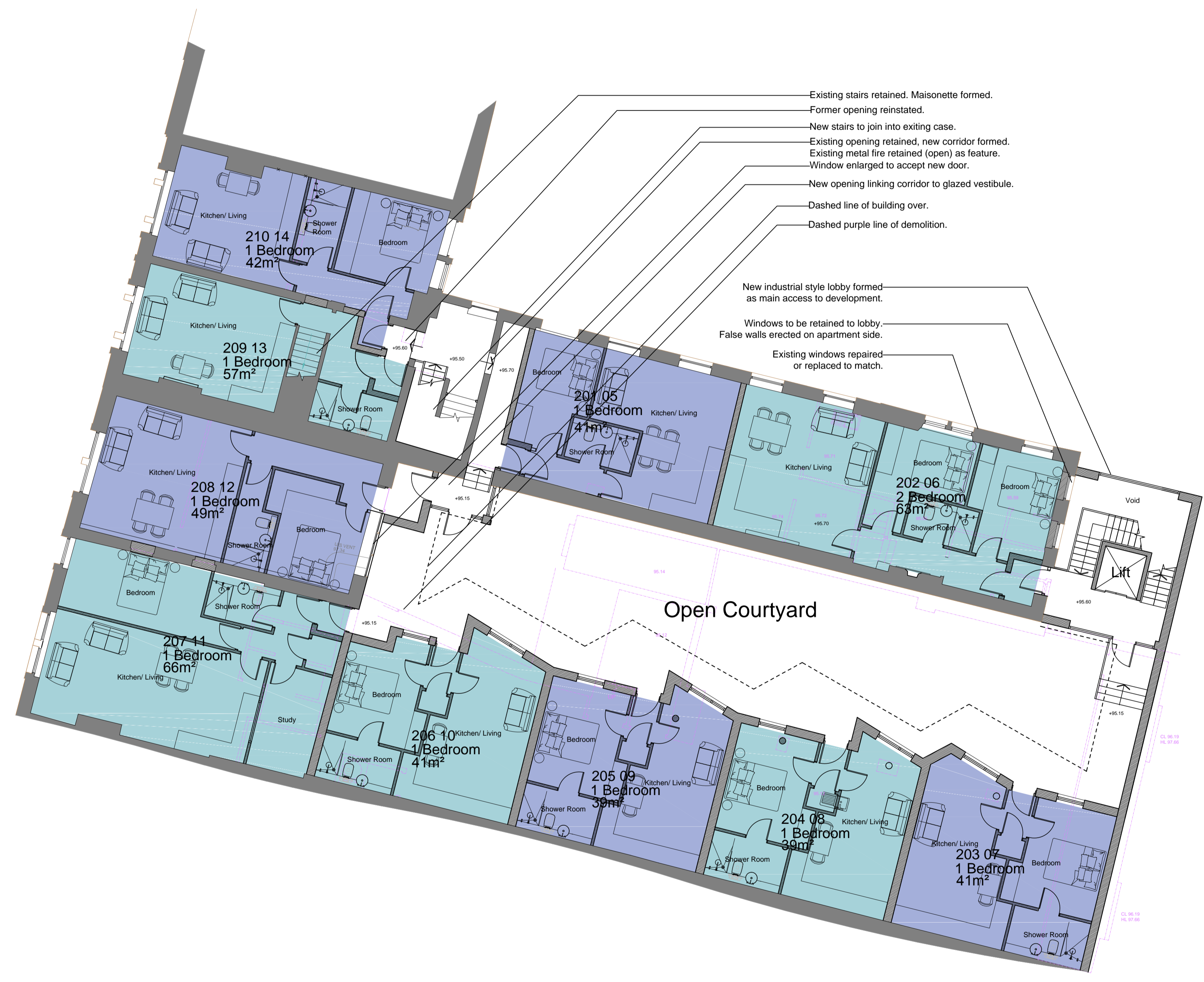
acumenarchitects.co.uk 01484 546 000
 Headrow House, Old Leeds Road, Huddersfield, HD1 1SQ

Client SA ASSOCIATES		
Project 61-65 NEW STREET HUDDERSFIELD		
Project No 2655	Drawing No (100)21	Rev /

Description
PROPOSED GROUND FLOOR PLAN

Scale 1:200 @ A1	Date Drawn MAY'21	Drawn By JF	Authorised By JC
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Purpose of Issue
 Planning Building Regs Tender Contractor Comment Info



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Client SA ASSOCIATES		
Project 61-65 NEW STREET HUDDERSFIELD		
Project No 2655	Drawing No (100)22	Rev /

Description
PROPOSED FIRST FLOOR PLAN

Scale 1:200 @ A1	Date Drawn MAY'21	Drawn By JF	Authorised By JC
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Purpose of Issue
 Planning Building Regs Tender Contractor Comment Info



- Existing stairs retained. Maisonette formed.
- Former opening reinstated.
- New stairs to join into exiting case.
- Existing opening retained, new corridor formed.
- Metal fire door retained (open) as feature
- Window enlarged to accept new door.
- Winding gear and trusses retained within corridor

Dashed purple line of demolition.

- New industrial style lobby formed as main access to development.
- Windows to be retained to lobby.
- False walls erected on apartment side.
- Trusses and dragon ties to remain exposed.

Existing windows repaired or replaced to match.

Void over courtyard

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Client: SA ASSOCIATES

Project: 61-65 NEW STREET HUDDERSFIELD

Project No	Drawing No	Rev
2655	(100)23	/

Description: PROPOSED SECOND FLOOR PLAN

Scale	Date Drawn	Drawn By	Authorised By
1:200 @ A1	MAY'21	JF	JC

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 DESIGNERS & ARCHITECTS

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Client
SA ASSOCIATES

Project
**61-65 NEW STREET
 HUDDERSFIELD**

Project No	Drawing No	Rev
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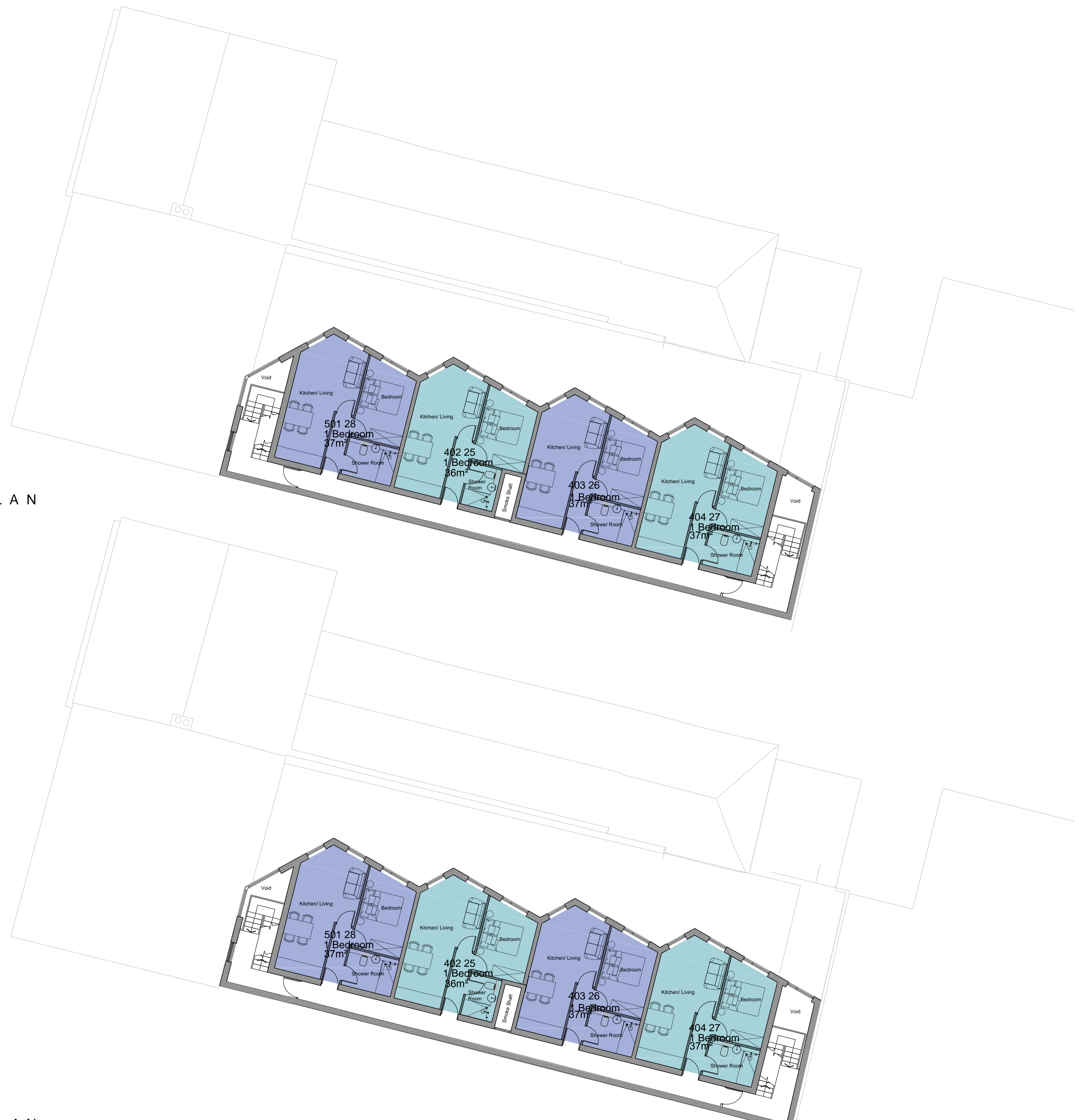
Description
**PROPOSED THIRD
 FLOOR PLAN**

Scale	Date Drawn	Drawn By	Authorised By
1:200 @ A1	MAY'21	JF	JC

Purpose of Issue
 Planning Building Regs Tender Contractor Comment Info

THIRD FLOOR PLAN

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FIFTH FLOOR PLAN

FOURTH FLOOR PLAN

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Client: SA ASSOCIATES

Project: 61-65 NEW STREET HUDDERSFIELD

Project No: 2655 Drawing No: (100)25 Rev: /

Description: PROPOSED FOURTH & FIFTH FLOOR PLAN

Scale: 1:200 @ A1 Date Drawn: MAY'21 Drawn By: JF Authorised By: JC

Purpose of Issue: Planning Building Regs Tender Contractor Comment Info

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SIXTH FLOOR PLAN

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Client SA ASSOCIATES		
Project 61-65 NEW STREET HUDDERSFIELD		
Project No 2655	Drawing No (100)26	Rev /

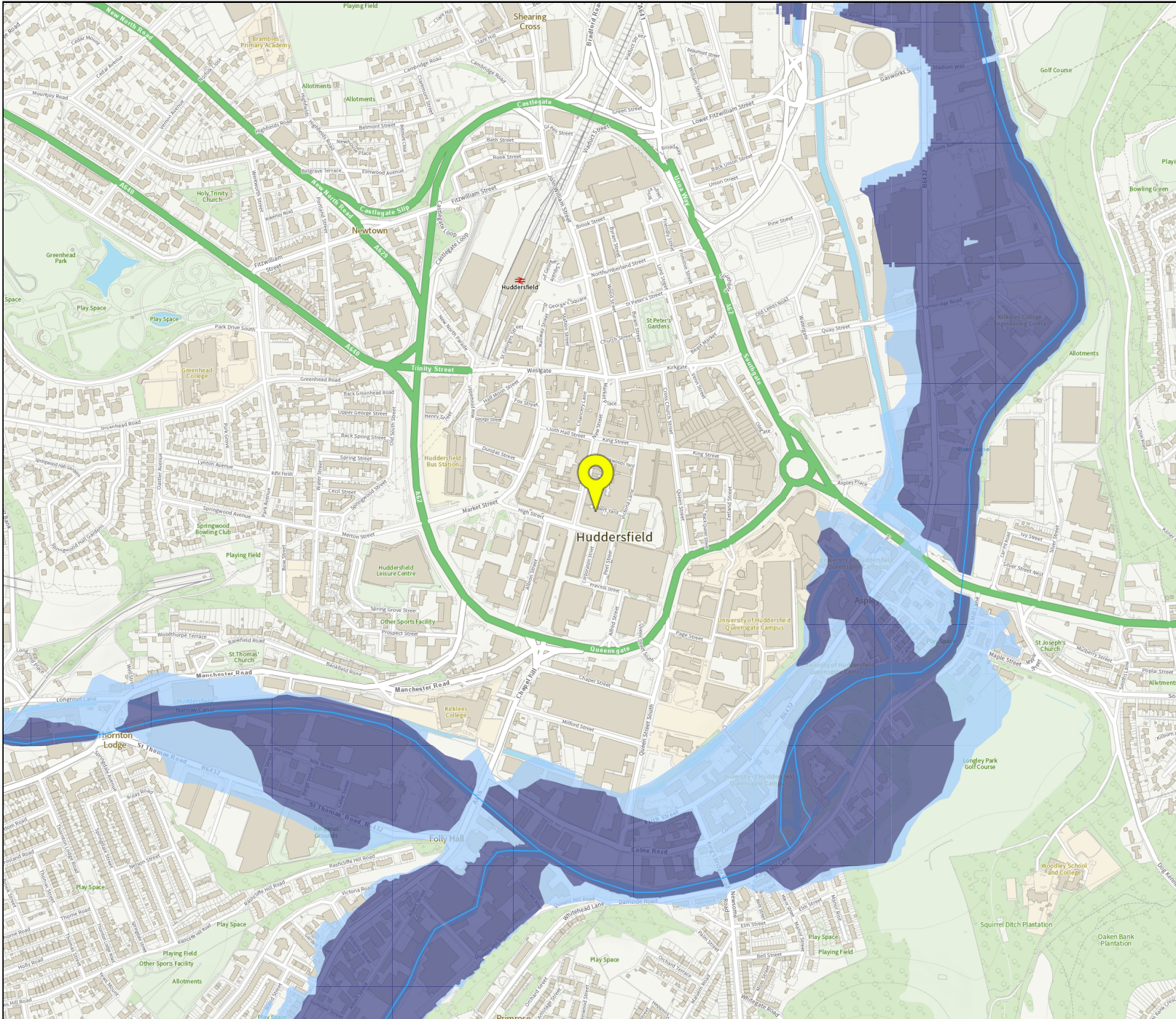
Description
PROPOSED SIXTH FLOOR PLAN

Scale 1:200 @ A1	Date Drawn MAY'21	Drawn By JF	Authorised By JC
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Purpose of Issue
 Planning Building Regs Tender Constructor Comment Info

Appendix C

Environment Agency Flood Map for Planning











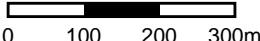
Flood map for planning

Your reference
20-002

Location (easting/northing)
414462/416487

Scale
1:10000

Created
18 Jun 2021 17:09

-  Selected point
 -  Flood zone 3
 -  Flood zone 3: areas benefiting from flood defences
 -  Flood zone 2
 -  Flood zone 1
 -  Flood defence
 -  Main river
 -  Flood storage area
- 
 0 100 200 300m

Appendix D

Kirklees Council
Pre-Application Response Letter

Enquiries to: Christopher Carroll

Tel: 01484 221000

Fax: 01484 221613

Email: christopher.carroll@kirklees.gov.uk

Hamish Gledhill
Acumen Designers and Architects
Headrow House
Old Leeds Road
Huddersfield
HD1 1SG

David Shepherd
Strategic Director Growth and
Regeneration

Date: 4th December 2020

Our Ref: 2020/20366

Your Ref: HG/JC/26

Dear Mr Gledhill,

Enquiry Number: 2020/20366

Description: Alterations and partial demolition and rebuild to create 43 apartments

Location: 61-65 New Street, Huddersfield, HD1 2BQ

I acknowledge receipt of your request for pre-application advice received on 25th August 2020 in relation to the above proposal and site. I refer to your pre-application submission and the meeting that took place between officers (Christopher Carroll (Development Management), Sue Oakley (Design and Conservation), Richard Thornton (Crime Prevention), Carol Oakden (Waste Strategy), Richard Hume (Environmental Health), James Barker (Economy and Skills), Liz Jefferson (Housing Growth)), Cllr Karen Allison and the applicant team on 22nd October 2020.

Background

As part of the pre-application advice service, the following internal teams have been consulted. These teams would be consulted as part of the decision-making process should an application be received:

- KC Business Economy and Regeneration
- KC Conservation and Design
- KC Ecology
- KC Education
- KC Environment Health
- KC Flood Management and Drainage
- KC Highways (Development Management)
- KC Landscape
- KC Policy
- KC Public Rights of Way
- KC Strategic Housing
- KC Waste Strategy (Refuse and Cleansing)
- WY Police Crime Prevention

It should be noted that no consultation has been carried out with external consultees such as Yorkshire Water, Historic England and the Coal Authority. It is strongly advised that you contact such bodies before an application is submitted.

Proposal

The enquiry site relates to the buildings addressed as 61-65 New Street, Huddersfield. The buildings have a primary frontage with New Street and a secondary frontage with Albert Yard. 65 New Street is currently occupied by the Post Office and Rotti Bar, which occupy the ground floor and basement. 63 New Street is currently a vacant former retail unit. The upper floors of both buildings are currently vacant.

The letter accompanying this pre-application enquiry explains how the proposal involves dividing the ground floor of 63 New Street into two smaller starter units. The ancillary basement to this unit would be converted to residential lock-up storage. The upper floors of 63 and 65 onto New Street would be reconfigured to form apartments and one maisonette.

A sketch proposal (drawing reference: 2655 SK01) accompanying this pre-application enquiry shows the demolition of the buildings to the rear of the existing buildings that face New Street and the creation of a new block of apartments with a central courtyard. Although, the supporting letter states that there would be forty three apartments, the sketch proposal appears to show fifty two apartments to be developed within the proposed new building and an additional 7 apartments to be provided within the existing building to the front. Two 2-bedroom apartments are proposed at ground floor level and would be 56sqm to 64sqm in size. 1-bedroom apartments are proposed at basement level and the upper storeys. These would range from 37sqm to 65sqm in size. Access to these apartments is proposed from Albert Yard.

A sketch material palette accompanying this preapplication enquiry shows that the proposed building would be constructed using ashlar cut stone walling, regular coursed stone, standing seam cladding and window surrounds and an expanded mesh cladding.

Planning Policy and Guidance

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for Kirklees is the Local Plan that was adopted on 27th February 2019.

It is considered that the following Local Plan policies are relevant for the proposal:

- LP1 – Presumption in favour of sustainable development
- LP2 – Place shaping
- LP3 – Location of new development
- LP5 – Masterplanning sites
- LP7 – Efficient and effective use of land and buildings
- LP11 – Housing Mix and Affordable Housing
- LP13 – Town centre uses
- LP14 – Shopping frontages
- LP15 – Residential use in town centres

- LP17 – Huddersfield Town Centre
- LP20 – Sustainable travel
- LP21 – Highways and access
- LP22 – Parking
- LP23 – Core walking and cycling network
- LP24 – Design
- LP27 – Flood risk
- LP28 – Drainage
- LP30 – Biodiversity and Geodiversity
- LP33 – Trees
- LP35 – Historic environment
- LP38 – Minerals safeguarding
- LP47 – Healthy, active and safe lifestyles
- LP51 – Protection and improvement of local air quality
- LP52 – Protection and improvement of environmental quality
- LP53 – Contaminated and unstable land
- LP63 – New open space

Other material considerations include:

- National Planning Policy Framework
- National Planning Practice Guidance
- Providing for Education needs generated by new housing
- Interim Affordable Housing Policy
- West Yorkshire Air Quality and Emissions Technical Planning Guidance
- Highway Design Guide Supplementary Planning Document
- The Huddersfield Blueprint - however officers acknowledge its withdrawal and thus limited weight can be given
- Waste Management Design Guide for New Developments

It is relevant to note that last year, the Council declared a climate change emergency and due consideration should be given as to how this proposal would help improve and protect the environment. More information can be found following the weblink: <https://www.kirklees.gov.uk/beta/climate-emergency/index.aspx>

Land use and principle of development

The enquiry site is located within the Huddersfield Town Centre, which is a defined Principal Town Centre. The site is also within a Primary Shopping Area in the Local Plan. Furthermore, New Street is designated as a Primary Shopping Frontage. Policies LP13 and LP14 of the Local Plan seek to maintain, provide, and enhance retail uses in this location and particularly at ground floor level.

The Local Plan encourages the provision of more residential accommodation within the borough's town centres. Policy LP15 states that proposals for residential uses in town centres will be supported subject to several criteria. Criterion a particularly seeks the protection of primary shopping areas and primary shopping frontage by permitting residential uses on the upper floors, and not prejudicing existing established uses. Policy LP17 confirms the council's intention to create new space within Huddersfield for town centre living. Town centre living is also encouraged in the vision for the town

centre as set out in the Huddersfield Blueprint. Other policies throughout the Local Plan promote the re-use of existing buildings and the use of brownfield (previously-developed) land to meet development needs and support the regeneration of areas (this is identified as a Strategic Objective at paragraph 4.5), and policy LP24 states that proposals should promote good design by ensuring high levels of sustainability through the re-use and adaptation of existing buildings. Similar policy objectives are set out in chapter 11 of the NPPF.

The proposal shows the retention of town centre uses at ground floor level adjacent to New Street, which is considered appropriate. However, residential accommodation is proposed at basement and ground floor levels which would potentially conflict with criterion a of policy LP15 of the Local Plan. Officers acknowledge that the existing unit on Albert Yard appears to have been vacant for some time but would still prefer the proposed apartments at basement and ground floor levels to be substituted with more appropriate retail/town centre uses. It is considered that the provision of more appropriate retail/town centre uses would create the necessary activity, animation which is much needed in Albert Yard as it currently lacks attraction and natural surveillance and is vulnerable to anti-social behaviour and the perception of crime. Although, it is welcomed that the proposed access points to the residential units would bring some new activity to the town centre, particularly in the evenings.

The principle of introducing residential uses at the enquiry site, which is considered to be in a sustainable location, is supported as it would be in line with the ethos of the stated planning policy objectives. However, as discussed at the meeting this particular proposal would fail to address the specific criteria set out in the same planning policy objectives, particularly those set out in Local Plan policies LP15 and LP17 of the Local Plan.

Design and heritage

Detailed comments have been provided by the Design and Conservation officer, who has explained how 61-65 New Street is part of a terrace of retail premises located within the Huddersfield Town Centre Conservation Area. The facades front New Street which is one of the principle shopping streets within the town centre, and the north-facing side elevation faces Albert Yard. 61 New Street is a three-storey Grade II listed mid-terraced building which dates to the early 19th century. This property has a white lime-rendered façade and stone slate roof, with a modern shop front on the ground floor, two pairs of tripartite windows on the first floor and two sash windows on the second floor.

63 New Street is described within the same list description and the building projecting from the rear of 61 and 63 New Street is also listed as part of the same building unless it can be demonstrated that it was in a different ownership and function at the time of listing in 1978. In recent years it has formed part of the same retail premises. The rear projection is a long four storey stone structure, also with a stone slate pitched roof and shop fronts on the ground floor, and with repetitive fenestration on the upper floors. This building appears from historic maps to date to the mid-19th century.

Several Grade II listed buildings surround the site, including the former Prudential Assurance building at 69 and 71 New Street, attached to 65 New Street, a number of listed properties on the west side of New Street, and Huddersfield Library to the east of Albert Yard. In addition, several unlisted buildings within the immediate vicinity contribute to the character of the conservation area, including The Albert public house.

The letter accompanying this pre-application enquiry states that the exterior of the buildings facing New Street would remain unchanged, with the ground floor of 63 New Street divided into two units. As the existing shop front is modern and as 61 and 63 New Street were historically two units, no concerns are raised regarding this matter. Ideally, however, officers would prefer the façade of the listed building to be enhanced as part of the proposal and it is suggested that traditional shop fronts be reinstated, using archive research to inform the design. These measures could attract positive weight in the balance of relevant planning considerations, and could help to outweigh harm and policy non-compliance in relation to other planning matters.

Officers support the proposal to bring vacant floor space into use by converting the upper floors of 63 and 65 into apartments. The impact on the interior of the listed building should be assessed, with minimal changes to the historic floor plan and any alterations or internal demolition fully justified.

The existing four-storey building to the rear of 61 and 63 New Street is constructed in stone with a rendered rear elevation and return, pitched slate roof, repetitive windows and some former taking in doors at each upper floor which may illustrate former uses, and are they therefore of historic interest. Officers consider that this building has a simple and functional form which is typical of this locality (as is its construction in natural stone) and makes a positive contribution to the character of the conservation area. Although some alterations such as partial rendering have been carried out which have had a negative impact, the building could be enhanced by the reinstatement of natural stonework or a well-designed contrasting finish. It is considered that the scale of this building sits comfortably within this yard, particularly in context with The Albert public house when looking west along Albert Yard.

Officers have several concerns about the proposed demolition of this historic building and the construction of a new apartment block in its place. In addition to the building being listed, officers consider that the demolition will harm the character of the conservation area by the removal of a historic element and loss of a historic view along Albert Yard. Such 19th century yards are characteristic of the Huddersfield Town Centre Conservation Area and add interest when viewed from the main streets. It would be preferable if this building and roofline were to be incorporated into a proposal rather than replaced.

As discussed at the meeting, an IHBC-recognised heritage consultant/architect should be employed. A Heritage Impact Assessment (HIA) should be prepared to assess the levels of significance within the proposal site, establishing which elements make a positive contribution and should be retained, and which make a neutral or negative contribution and can be demolished. The assessment should look at the impact of the development on the setting of the listed buildings within the site, surrounding listed buildings and the conservation area itself.

Any demolition will need to be justified with reference to NPPF paragraph 195, and any harm caused by the proposed demolition and new apartment block will need to be weighed against the public benefits of the proposal. If the rear building facing Albert Yard is incapable of incorporation into a residential scheme, the justification will need to be clear and convincing, with supporting evidence such as a structural report, condition survey and development appraisal. Chapter 16 of the NPPF should be considered when preparing an application, along with Kirklees Local Plan policies LP15, LP17, LP24 and LP35, and the Huddersfield Blueprint.

Subject to the HIA, there is likely to be potential for the demolition and replacement of the building behind 65 New Street, which appears to be of little significance and is set within a hidden space to the rear of other buildings.

Officers have concerns about the height of the proposed apartment block which is likely to be visible from New Street and further afield from Ramsden Street, and possibly other locations. Any development at this site must not loom behind and over dominate important buildings that front the street, and the patterns of heights typically found within the town centre should not be unduly disrupted by any development. It would be preferred if the proposed building is reduced in scale towards the New Street elevation, perhaps by two storeys, so that the roof lines within this part of the conservation area are not compromised.

Officers welcome the use of a contemporary design and the proposed natural stone, however, any design should not be designed in isolation and should instead enhance the character and appearance of the heritage assets and the local area. Careful use of high quality non-traditional materials may be acceptable in certain parts of the site but must be considered in context with the surrounding built environment.

Residential Amenity

It is welcomed that all of the proposed apartments appear to comply with the Government's Nationally-Described Space Standards. However, it is unclear whether all dwellings would have good access to natural light and private amenity space. Although no separation distances are included within Local Plan policy LP24, the council still expects appropriate separation distances between existing and proposed dwellings. For instance, a separation distance of 21m between facades with habitable room windows is advisable. Also, due consideration needs to be given to the location of habitable room windows adjacent to neighbouring sites or any potential development sites. The location of these openings should not prevent future development being brought forward, and should not compromise future residential amenity.

Local Plan policy LP24 requires developments to provide an adequate standard of amenity for residents. Regarding outdoor amenity space, while it is accepted that such a constrained site offers little opportunity for the provision of extensive areas, options for some form of provision should be explored. The submitted plans show a proposed central courtyard with a shared garden and amenity area. This would be enclosed on all sides by six storeys of massing. Officers therefore question whether this space would provide meaningful amenity (would it, for example, receive any direct sunlight?), and would also question how this space would be used and whether its use would compromise the residential amenity of the potential occupants, particularly those living at first floor level.

Outlook from, and natural light to, some of the proposed apartments is of concern. Unit 110, for example (and other single-aspect apartments proposed along the site's southern boundary) would appear to be entirely reliant on outlook onto, and natural light from, the heavily-enclosed proposed central courtyard, both of which are likely to be limited.

The proposed development is within the town centre and adjacent and above existing commercial uses. Therefore, in accordance with NPPF paragraph 182 it should be demonstrated how the proposed new development can be effectively be integrated with existing businesses and community facilities, ensuring that the proposed residential use would not result in future unreasonable restrictions placed on them.

There is a likelihood that existing noise in the area would have an adverse impact on occupiers of parts of the development. Therefore, an assessment of the existing noise levels would be required.

This should assess the noise from all likely sources in the vicinity of the development, and determine the impact of these on the development. If the existing noise is likely to have an adverse impact then the report should also provide details of any necessary noise mitigation measures to ensure that satisfactory sound levels are achieved at the development. If the report concludes that satisfactory sound levels can only be achieved with windows closed then the mitigation measures need to include details of alternative ventilation to replace that normally provided by open windows. For sustainability reasons, options for natural ventilation should be explored before any mechanical ventilation is proposed. This needs to be sufficient to provide summer cooling during hot weather to help avoid overheating. Acoustic trickle vents alone would be insufficient to achieve this and will therefore not be accepted. Furthermore, consideration needs to be given as to how these mitigation measures can be appropriately designed so that they do not have an adverse impact on the character and appearance of the conservation area and listed building. All this information should be provided as part of any planning application.

The proposed development is within an existing Air Quality Management Area (AQMA). The proposal involves the creation of residential accommodation on the upper floors, therefore the development would be introducing new receptors into the AQMA. Environmental Health officers have reviewed the proposal and consider the roads in the immediate vicinity of this development to not be of concern with respect to poor air quality, and therefore the proposal is unlikely to pose a risk to human health.

Housing mix and affordable housing

It is considered that the proposal would not address Local Plan policy LP11 in creating a balanced and mixed sustainable community due to the proposed over-provision of 1-bed apartments. Any proposal should take into consideration the Kirklees Strategic Housing Market Assessment (SHMA) Huddersfield South sub area, and should include a mix of live/work units, 2-bedroom apartments and 3-bedroom apartments. Furthermore, 20% of the dwelling units should be affordable with an affordable tenure split of 55% social or affordable rent to 45% intermediate housing.

Highways and waste

At the time of writing this letter, no comments had been received from Highways Development Management. Comments will be forwarded onto you once received.

Development Management acknowledge the site's sustainable location which would likely reduce the potential occupants' dependency on the car. However, any planning application should be supported by a Transport Statement and Travel Plan to demonstrate how the proposal would accord with Local Plan policies LP15 (Residential use in town centres), LP17 (Huddersfield Town Centre), LP20 (Sustainable travel), LP21 (Highways and Access), and LP22 (Parking), and the council's Highway Design Guide Supplementary Planning Document (<https://www.kirklees.gov.uk/beta/planning-policy/pdf/highway-design-guide-spd.pdf>). The Transport Statement should clearly set out the existing situation and the proposed measures to address any potential adverse impacts in relation to parking and highway safety in the locality. Any development proposal should also include provision of space for the storage of bicycles. Furthermore, any planning permission would likely be subject to planning obligations for financial contributions towards travel plan monitoring and for promoting public transport use.

The council's Waste Strategy officer has reviewed the pre-application enquiry against the policy requirements of LP24 part d (vi), LP43 and the Kirklees Highway Design Guide SPD in respect of

refuse collection, and provided the following comments that should be considered before a planning application is submitted:

- Based on the supporting letter of 43 apartments would generate a waste storage requirement for a total of 14x 1100ltr bins (seven for general waste and seven for recyclable waste) based on the council's standard fortnightly alternating collection schedule.
- The submitted sketch layout for the scheme shows a ground floor storage room illustrated with 11 bins (presumed to be 1100ltr) – this shortfall needs to be addressed to avoid excess waste being left on the street or contaminating the storage room.
- The storage room itself, being integrated into the building, will need ventilation and vermin control, and fire prevention measures as per the requirements of the Building Regulations.
- The sketch layout shows two sets of double doors to gain entry to the storage room which conforms to the council's requirements for access. Details will be required regarding the security measures on these doors, and the access arrangements for collection crews.
- Vehicular access to Albert Yard can only be taken from Victoria Lane which is pedestrianised. This will restrict collection times and may impact on the service the council is able to provide. Consultation with the authority should be undertaken as early as possible to ensure a service can be provided. Full details of collection arrangements and access should therefore be required by a pre-commencement condition.

Flood risk and drainage

The enquiry site is located within flood zone 1 and as such there is a low risk of main river flooding. Surface water flood risk maps also reveal no areas of concerns and there are no reports of flooding in the immediate vicinity of the development.

As this is a town centre location, and as the proposal involves a partial demolition and rebuild with an unchanged footprint, the scope to enforce a brownfield drainage strategy whereby peak discharges are reduced by 30% will prove difficult as per Local Plan policy LP28. There is no space within the red line boundary for underground attenuations. There is no space for soakaways and the property has a basement which excludes this method of disposal in any case. In order to attempt to make improvements to discharges to the public sewer network (the existing outfall), the Lead Local Flood Authority (LLFA) has requested that you explore opportunities of flat roof buildings to utilise green roofs, which may better manage storm events. The LLFA may accept such a proposal as meeting sustainable requirements.

However, if such green roofs are proposed, details as to its management and maintenance should be included within any planning application.

Please note that the provision of green roofs would need to be considered in light of the above advice relating to design and conservation matters. Please also note that, to support adequate substrate, any new building would need to be carefully designed to accommodate the additional loading associated with green roofs.

Biodiversity

No ecological information has been provided within your pre-application enquiry. According to the council's GIS map the site is within a Swift nesting area and within a SSSI IRZs area. However, given the location of the site and the nature of the proposal the council's Biodiversity Officer has few concerns over the potential for significant ecological harm.

It is strongly recommended that a suitably-qualified ecologist is employed to ensure that the proposal accords with Local Plan policy LP30 (Biodiversity and Geodiversity). Any planning application should demonstrate that the proposal site will deliver a 10% biodiversity net gain using Natural England's Biodiversity Metric 2.0 (JP029) calculation tool. This may result in the need for an appropriate off-site financial contribution to facilitate the necessary biodiversity gain elsewhere in the district.

It should be noted that nesting swift have been recorded within 150m of the site, which presents an opportunity to establish new nesting colonies on the site. Options to include provisions for nesting swift within the new development should be explored, together with the potential to promote other habitats associated with green roofs. This would require the input of a suitably qualified ecologist. However, careful consideration needs to be given as to the design of these features so that they do not have an adverse impact on the character and appearance of the conservation area and the setting of the nearby Grade II listed building.

Public open space and landscape

At the time of writing this letter, no comments had been received from the council's Principal Landscape Architect. Comments will be forwarded onto you once received.

In relation to Local Plan policy LP63, the council will seek to secure well-designed, new and improved open space, sport and recreation facilities in the district to encourage everyone in Kirklees to be as physically active as possible and to promote a healthy lifestyle for all. It is considered that given the scale of the proposal it would not be viable to provide such public open space on site. Therefore, an off-site public open space financial contribution would be sought for improvement of other public open spaces within the Newsome ward, which would be based on the numbers and types of apartments to be provided.

Other matters

Environmental Health officers have explained how the proposed development is partly on land that may be potentially contaminated from its historical use (site reference 649/9 1890 Printing Factory). Therefore, given the scale and nature of the proposed development, any planning application should be supported by a Phase 1 land contamination report (desktop study). Depending on the outcome of this report, pre-commencement conditions related to land contamination may be necessary.

The site is within a Sand and Gravel with Sandstone and Surface Coal Resource minerals safeguarding area. Although, officers would consider mineral extraction in this location would be inappropriate due consideration still needs to be given to Local Plan policy LP38 of the Local Plan to demonstrate that this development proposal would not sterilise any future mineral extraction, and/or whether any of the exceptions set out in policy LP38 are applicable.

Last year, the council declared a climate change emergency and Members take a keen interest in how development proposals have addressed this matter. As such, any supporting information should demonstrate how climate change (including in relation to renewable and low carbon energy, energy efficiency, water use, flood risk and drainage, management of water bodies and use of materials) has been properly considered, in line with Chapter 12 of the Local Plan and Chapter 14 of the NPPF.

In accordance with paragraph 40 of the NPPF, you are encouraged to carry out local consultation prior to submitting your planning application, and to set out the results of this consultation exercise in a Statement of Community Involvement.

Any proposal should prevent crime and opportunities for anti-social behaviour. This letter is accompanied by detailed comments from the West Yorkshire Police Designing Out Crime officer that should be considered. Measures in compliance with Secured by Design guidance ([http://www.securedbydesign.com/wp-content/uploads/2017/06/Secured by Design Homes 2016 V2.pdf](http://www.securedbydesign.com/wp-content/uploads/2017/06/Secured_by_Design_Homes_2016_V2.pdf)) would be appropriate. The advice provided by the Designing Out Crime Officer accompanies this letter. If you would like to discuss any of these measures, then please contact Richard Thornton (richard.thornton@westyorkshire.pnn.police.uk, 01484 221000).

Furthermore, confidential advice has been provided by National Counter Terrorism Police, which accompanies this letter.

Validation Requirements

For your planning application to be considered valid, you would need to submit the following information:

- Relevant plans and drawings, including location plan, block plan, existing and proposed site plans, street scene drawings, elevation drawings, floor plans, long and cross sections
- Schedule of accommodation, including the sizes of each dwelling type in square metres (GIA)
- Design and Access Statement
- Heritage Impact Assessment
- Structural report, condition survey and development appraisal
- Transport Statement
- Travel Plan
- Noise Impact Assessment
- Planning Statement, considering the key policy considerations and including any draft Heads of Terms for a Section 106 agreement and details of affordable housing
- Statement of Community Involvement (if details of local consultation are not set out in your Planning Statement)
- Drainage Strategy, including details of surface and foul water disposal
- Ecological Impact Assessment, including the demonstration of net biodiversity gain and any subsequent survey work
- Phase 1 contaminated land report

Kirklees's current validation requirements for planning applications can be viewed online at: <http://www.kirklees.gov.uk/beta/planning-applications/pdf/validation-checklist.pdf> .

Conclusion and way forward

The proposal in its current form would not be acceptable when considered against the town centre, design and heritage related policies within the Local Plan. Officers particularly have concerns that this proposal would have an adverse impact on the character and appearance of the Huddersfield Town Centre Conservation Area, the settings of grade II listed buildings, the impact on shop

Planning

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frontages within the town centre (i.e. lack of improvements to the enquirys site shop frontage and loss of retail/town centre uses with Albert Yard) and residential amenity concerns.

Officers believe that the introduction of a residential use at this site could be possible. However, in the first instance a chartered heritage consultant should be employed to fully assess the heritage constraints. The preference is for the retention and adaption of key buildings within the red line boundary. Once this constraint is fully understood it is strongly recommended that another pre-application enquiry is submitted to fully explore and address the other issues raised in this letter.

Please note that the advice set out in this letter is given without prejudice, and that any future planning application for development at this site would be subject to public consultation. Should you wish to discuss the contents of this letter, or require further information, please contact the case officer Christopher Carroll on the number above, or by email.

Yours sincerely,

Victor Grayson

Victor Grayson
Development Management Masterplanner
Majors and Minerals