Planning Statement

Dewsbury Riverside, Central Gateway

On behalf of Kirklees Council

September 2021

BARTON WILLMORE

Planning Statement

Dewsbury Riverside

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APPENDIX 1 – Local Plan Extract – Policy HS61 – Dewsbury Riverside

1.0 INTRODUCTION

Background

1.1 This Planning Statement has been prepared by Barton Willmore on behalf of Kirklees Council ("the Applicant") in support of a hybrid planning application for residential development, including associated works to provide access, drainage and green infrastructure at Dewsbury Riverside, Central Gateway ('the Site').

1.2 The Site comprises Council-owned land, and the first phase at Dewsbury Riverside, to the south of Ravensthorpe Road, and forms part of the wider Local Plan Allocation for Dewsbury Riverside (HS61 of the Kirklees Local Plan).

The Site

1.3 The site is circa 29ha of land and is situated to the south of Ravensthorpe Road / Lees Hall Road, approximately 2km to the south west of Dewsbury Town Centre.

1.4 The wider allocation aims to deliver 4,000 residential units with associated education and community facilities; circa 2,000 of those units are to be delivered beyond the current plan period.

The Proposed Development

1.5 The proposed development comprises the first phase of the wider allocation at Dewsbury Riverside. The proposed development will deliver the early infrastructure in terms of highways and drainage, required to bring forward the wider allocation; including the delivery of a new central access point for the scheme via a new roundabout at Forge Lane.

1.6 The application proposals are the culmination of several years of work appraising alternative options for the Site by the Council. As part of the wider area's promotion through the preparation of the Local Plan, which was adopted in February 2019, Miller Homes produced a Delivery Framework, which informed the allocation and policy requirements.

1.7 The proposals represent an exciting step forward for the development of the Site and have been informed by engagement with the local community, Members and pre-application dialogue with Planning Officers at Kirklees Council.

1.8 The description of development is as follows:

"Hybrid planning application comprised of:

a) Application for full planning permission for engineering works, drainage and utilities connection for the provision of site access from Forge Lane and Ravensthorpe Road and associated works; and,

b) Application for outline planning permission for the erection of up to 350 dwellings and mixed use development (including community facilities) with associated works including the provision of internal estate roads and parking, landscape works (including provision of public open space, tree clearance/replacement/woodland management and ecological management) and sustainable urban drainage works drainage principles.

1.9 The application boundary also includes the relocation of existing allotments, which are the subject of a separate planning application (ref. 2021/90552).

Purpose of the Statement

1.10 The purpose of this Planning Statement is to assess the proposed development against the relevant development plan policies and any other material considerations in accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004).

1.11 The statutory development plan for the purpose of determining this planning application is the Kirklees Local Plan, which is comprised of the following documents:

- Kirklees Local Plan: Strategies and Policies (2019); and
- Kirklees Local Plan: Allocation and Designations (2019)

1.12 The guidance contained in the National Planning Policy Framework (NPPF) (2021) and in the Council's adopted Supplementary Planning Documents are also important material considerations.

Planning Application Package

1.13 The planning application is accompanied by a comprehensive range of supporting documentation and plans which should be read in conjunction with this Planning Statement.

1.14 The scope of the planning application was agreed with the Council during pre-application discussion. Table 1 below identifies each of the submission documents and their author.

Drawings	**Reference**	**Author**
Site Location Plan	32147-DWG05-E	BW
Full Application – for determination		
Phase 1 Index Plan	DR-BH-XX-XX-DR-C-00-2150	BH
Phase 1 General arrangement	DR-BH-XX-XX-DR-C-00-2151 to 53	BH
Phase 1 Contours	DR-BH-XX-XX-DR-C-00-2154 to 56	BH
Phase 1 Earthworks - Isopach	DR-BH-XX-XX-DR-C-00-2157 to 59	BH
Phase 1 Markings	DR-BH-XX-XX-DR-C-00-2160 to 62	BH
Phase 1 Longsection sheets	DR-BH-XX-XX-DR-C-00-2164 to 66	BH
Phase 1 Cross section sheets	DR-BH-XX-XX-DR-C-00-2167 to 69	BH
Phase 1 Highways Drainage	DR-BH-XX-XX-DR-C-00-2170 to 72	BH
Highways Landscape Design	4678- 02 to 05	BH
Outline Application – for determination		
Parameters Plan – Scale	32147 -Ai14-C	BW
Parameters Plan – Green Infrastructure	32147 -Ai15-C	BW
Parameters Plan – Land Use and Access	32147 -Ai16-C	BW
Illustrative Masterplan	32147 -Ai22-A	BW
Documents		**Author**
Design and Access Statement	32147	BW
Planning Statement	32147	BW
Statement of Community Involvement	32147	BW
Health Impact Assessment	32147	BW
Transport Assessment		DTL

Travel Plan		DTL
LVIA	CONFIRM	DEP
Archaeological DBA and Heritage Statement		WA
Preliminary Geo-environmental Desk Study	3901/1	Lithos
Geo-environmental Appraisal	3901/1	Lithos
Remediation Strategy	3901/1	Lithos
Tree Survey		IT
Ecological Impact Assessment	0048206	BH
Flood Risk Assessment	0048206 - BHE-XX-XX-RP-FR-0001	BH
Surface Water Drainage Strategy	0048206 - BHE-XX-XX-RP-C-DR01	BH
Air Quality Assessment	048206-BHE-XX-XX-RP-AQ-0001	BH
Noise and Vibration Assessment	VC-103588-EN-RP-0001	Vanguardia
Climate Change Statement	0048206-BHE-XX-XX-RP-SP-0001	BH

Table 1: Planning Application Documents

Structure of this Statement

1.15 The remaining sections of this Statement are structures as follows:

- Section 2 describes the Site and its surroundings;
- Section 3 provides a detailed description of the proposed development;
- Section 4 details the pre-application consultation undertaken;
- Section 5 summarises the development plan policies relevant to the determination of this application and outlines any other relevant material considerations;
- Section 6 sets out the Affordable Housing Statement;
- Section 7 sets out the Case for Development;
- Section 8 provides a summary and concluding remarks.

2.0 SITE LOCATION AND DESCRIPTION

Site Location

2.1 The Site is located to the south of Ravensthorpe Road / Lees Hall Road, and is situated approximately 2km to the south west of Dewsbury Town Centre. Dewsbury is identified as a main urban area, within the adopted Spatial Development Strategy; alongside Huddersfield, Dewsbury is expected to deliver the most growth over the plan period.

2.2 The Site forms part of the wider Dewsbury Riverside allocation (the Site will be its first phase), which looks to address the local and regional shortage of housing and will contribute to the regeneration of the wider area, as a key element of the North Kirklees Growth Zone. The North Kirklees Growth Zone is an initiative established as a Leeds City Region spatial growth priority, which intends to provide a number of mechanisms to facilitate growth and enable investment into Dewsbury Town Centre.

Site Description

2.3 The Site is irregular in shape and extends to circa 29ha. The Site currently comprises mostly agricultural land as well as a number of smaller parcels of land to the north east of the Site which are required to facilitate the proposed new access off Forge Lane.

2.4 As well as agricultural land, the Site includes the Masjid Abubakr Mosque and Lees Hall Playgroup building at 555 Lees Hall Road to the north east of the Site. to the south of the Mosque, the site also includes the Ravensthorpe Road Allotments which, as per the previous chapter of this report, are currently in the process of being relocated within the Site (but subject of a separate planning application).

2.5 There is also area of woodland, known as 'Lady Wood' located to the west of the Site and is designated in the Kirklees Local Plan as part of the Strategic Green Infrastructure Network known as the River Calder Corridor.

2.6 The topography of the Site is relatively steep with its lowest point (approximately 50m above ordnance datum (AOD)) at the north eastern extent of the Site rising to some 90m AOD within the western and south western extents of the Site.

2.7 The Site has a number of constraints with regards to utilities infrastructure as well as historic mine shafts and formal workings across the Site. The Site also has a number of claimed public bridleways running across it. These constraints are detailed in full within the accompanying Design and Access Statement and Environmental Investigations submitting with this application.

2.8 The Local Plan also identifies the Site as a Biodiversity Opportunity Zone and the Site is located within a Mineral Safeguarding Zone.

2.9 Ravenshall School, a community special school from ages 5 to 19, is located to the north east of the Site, and is enveloped by but excluded from the application boundary.

2.10 Access to the Site is currently provided via various single-track access points on Ravensthorpe Road, including a gated track which extends past Ravenshall School.

2.11 The northern boundary of the western extent of the Site is formed by the Huddersfield railway line, with the River Calder beyond. The northern boundary of the eastern extent of the Site bound by the back gardens of the residential properties along Ravensthorpe Road / Lees Hall Road.

2.12 The eastern boundary of the Site is partly bound by existing residential properties and an existing track, with the suburb of Thornhill Lees located beyond, whilst the western extent of the Site is bound by agricultural land.

2.13 The southern boundary of the eastern extent of the Site bound by a track and a residential property, with agricultural land beyond. The southern boundary of the western extent of the Site is bound by fields.

Surrounding Area

2.14 To the north, the surrounding area is predominantly residential, with the suburbs of Ravensthorpe and Thornhill Lees located to the north west and north east, respectively. Ravensthorpe Industrial Estate is located approximately 280m to the north east and offers a range of employment opportunities.

2.15 The surrounding area to the south of the Site is mainly comprised by open grassland, including Priest Royd Wood, a network of public rights of way (PRoW) and a stream.

The south west is comprised by Dewsbury District Golf Club, a livery stables and some residential properties.

2.16 Dewsbury Town Centre is located approximately 2km to the north east, and offers a range of town centre services and facilities, including banks; a health centre and pharmacy; a post office; a variety of convenience and comparison stores; restaurants, cafes and pubs; and professional services, such as solicitors and estate agents.

2.17 On a more localised scale, the district centre of Ravensthorpe and local centre of Thornhill Lees offer convenience stores, a post office, and pharmacies.

2.18 The Site is in a highly sustainably location. Future residents will be able to walk and cycle to a range of day-to-day amenities, including those facilities and employment opportunities listed above, as well as sports and recreational facilities such as Dewsbury District Golf Club and Lady Lakes Fishery, both located approximately 500m to the south west.

2.19 A number of bus stops are located along Lees Hall Road, along the northern boundary of the Site and provides hourly services to Wakefield City Centre and Dewsbury. Ravensthorpe Train Station is located approximately 120m north of the Site and provides trains to Leeds, Huddersfield and Wigan.

2.20 Off-site, at the junction of Calder Road and Ravensthorpe Road, Network Rail proposals for the Trans-pennine Rail Route (Huddersfield to Westtown) comprise a proposed re-aligning of the Calder Road Bridge and the provision of a new roundabout junction and railway access to the south of the river.

2.21 Overall, the Site occupies a highly sustainable location with good local service provision and access to public transport services, providing future residents with an alternative to the private car. Further details regarding accessibility can be found within the Transport Assessment and Design and Access Statement submitted in support of this Application.

Statutory Designations

2.22 The Site is not subject to any statutory designations, including Sites of Special Scientific Interest, Ramsar Sites and Special Areas of Conservation.

2.23 In terms of built heritage, there are no designated above ground heritage assets within or adjacent to the Site and the Site is not located within a Conservation Area. The closest heritage assets comprise the Grade I Listed Thornhill Lees Hall, Grade II* Listed Second Hall and Grade II Listed former gatehouse and barn, which are all located approximately 270m north-east of the Site.

2.24 The Site is located within Flood Zone 1, and therefore is at the lowest risk of flooding.

Planning History

2.25 A search of the Council's online register has been undertaken to review the planning history of the Site. The search uncovered the following applications at the Site.

2.26 Outline planning application **99/60/93454/E2** for residential development, which was submitted by Redrow Homes in December 1999 and subsequently withdrawn.

2.27 Outline planning application **2016/60/94118/E** for residential development, which was submitted by Miller Homes in December 2016, and approved in April 2017.

2.28 Reserved matters application **2021/61/91759/E** (layout, appearance, scale and landscaping) for the erection of 120 dwellings pursuant to outline permission 2016/94118 for erection of residential development and discharge of Condition 6 (a) and (b) (Affordable Housing), Condition 7 (a) (Open Space layout), Condition 14 (Noise) and Condition 15 (Low Emission Vehicle Recharging Points), which was submitted on 27th April 2021 and is awaiting a decision at the time of writing.

3.0 PROPOSED DEVELOPMENT

Development Description

3.1 The Applicant submits a hybrid planning application comprising:

"a) Application for full planning permission for engineering works, drainage and utilities connection for the provision of site access from Forge Lane and Ravensthorpe Road and associated works; and,

b) Application for outline planning permission for the erection of up to 350 dwellings and mixed use development (including community facilities) with associated works including the provision of internal estate roads and parking, landscape works (including provision of public open space, tree clearance/replacement/woodland management and ecological management) and sustainable urban drainage works drainage principles."

3.2 The proposed development includes detailed highway proposals which are designed to facilitate future phases of development at the Dewsbury Riverside Allocation. The proposals include an initial spine road from the proposed Forge Lane access to a new internal roundabout which will serve the wider allocation. From that roundabout, two arms of an internal spine road are proposed. The first, to the north west will provide access to the north west corner of the Site and is capable of connecting to the proposed future roundabout junction at Calder Road as part of Network Rails Transpennine track improvement works. The second provides a southern section of the spine road which will provide access to the southern and western portion of the Site as well as providing the basis for a future highway loop to the south of the Site to serve the wider Dewsbury Riverside Allocation.

3.3 The development will retain and manage the existing woodland in the western extent of the Site to deliver biodiversity net gain along with environmental enhancements across the rest of the Site.

3.4 The application boundary also includes the existing allotments at Ravensthorpe Road which are to be removed and relocated to the west of Ravenshall School; the relocation of the allotments is subject of a separate planning application (ref. 2021/90552).

3.5 The development will require the demolition of the Masjid Abubakr Mosque and Lees Hall Playgroup building at the north eastern corner of the Site to facilitate the delivery of the Forge Lane Access which will serve the Site and wider Dewsbury Riverside

Allocation. The proposed development includes an area designated for mixed use development which is capable of providing a replacement community facility to compensate for the loss of the community facilities at the Mosque and Playgroup building (including with enhanced access provision) ensuring that there will be no net loss of community facilities at the Site. Any detailed provision of a replacement community facility will be the subject of a reserved matters application. The potential of the Site to provide a replacement community facility to be operated by the trustees of the Masjid Abubakr Mosque and Lees Hall Playgroup is the subject of ongoing dialogue with those trustees.

Detailed Proposals

3.6 Full details of the proposed development are set out within the Applicant's planning application drawings package and Design and Access which accompanies this planning application.

3.7 The DAS confirms that the Applicant has undertaken a comprehensive review of the Site which has been used as a basis to propose detailed highways and drainage proposals and fixed parameters for development to accommodate residential development associates works.

3.8 The Application Parameters Plans and DAS which has been prepared in support of the application, sets out the following parameters:

- Residential and Mixed Use Development Areas to provide up to 350 new homes and new community facilities;
- Primary vehicle access from Forge Lane;
- Secondary vehicle access from Ravensthorpe Road;
- Internal Roundabout and Spine Road provision;
- Areas for Sustainable Urban Drainage;
- Green Infrastructure Areas to provide landscape areas for nature and biodiversity enhancements and open space for recreation and play; and,
- Pedestrian and Cycle Infrastructure;

3.9 Development proposals that differ from the Parameters Plans may also be acceptable at the Reserved Matters stage, provided that they broadly adhere to the development parameters and design principles set out within the Design and Access Statement.

Illustrative details of how the above development may be delivered are provided within the DAS.

Parameters

3.10 The submitted Parameters Plan include Land Use and Access, Scale and Green Infrastructure and are submitted with the Application Drawing Package and set out the proposed development limits for the development. Specific details of the parameters are set out below.

Land Use

3.11 The Parameters Plan proposes a total residential area of 8.7ha, comprising up to 350 dwellings. A well-connected and integrated area of approximately 18.8ha of open space is also proposed, and comprises retained and enhanced landscape features, new planting, drainage features and pedestrian and cycle routes.

3.12 The main residential element of the proposed development will be accommodated at the centre of the Site, to the rear of properties on Ravensthorpe Road. Further residential provision will be made to the north-east of the Site within the proposed mixed use area of the Site adjacent the proposed Forge Lane Access and spine road, along with community facilities described above. For the avoidance of doubt, that mixed use area has the potential to accommodate the relocation of the community facilities currently provided at the mosque and playgroup hall.

3.13 The allotments, which are subject to a separate planning application (ref. 2021/90552), are located adjacent to the existing school, and will be accessed via a separate access from Ravensthorpe Road.

3.14 The existing woodland on the western extent of the Site will be retained and managed to provide significant ecological enhancements and to provide biodiversity net gain in line with the recommendations of the Biodiversity Net Gain (BNG) recommendations submitted with this application.

Access

3.15 As above, the detailed element of the planning application comprises an access roundabout and spine road, proposed from Forge Lane (including associated junctions

and drainage); secondary access from Ravensthorpe Road; and internal spine road links designed to facilitate access to the proposed new Network Rail roundabout junction at the corner of Calder Road and Ravensthorpe Road as well as future development phases to the south and west of the Site.

3.16 Primary vehicular access to the Site will be provided from Forge Lane. The secondary access from Ravensthorpe Road will be required to deliver the first phase of the development. The secondary access will also facilitate the provision of community facilities at the Site (or land for their future provision) prior to the demolition of the mosque and playgroup hall.

3.17 In addition to the proposed points of vehicular access, pedestrian access to the Site will be provided from an existing footpath network as well as the proposed highway network and is proposed to connect at four points along the southern and northern boundaries.

Scale

3.18 The residential development will accommodate predominantly 2 storey housing, with occasional increases to 2.5 storeys to support legibility and placemaking objectives. Variety in the heights and massing of the residential dwellings will be achieved through the use of a range of house types and sizes, ranging from apartment blocks supporting 1 and 2 bedroom apartments, to larger 4 and 5 bedroom detached houses.

3.19 Key development frontages, such as those overlooking areas of public open space and following the primary movement route, will be particularly prominent and critical to the appearance of the development. On the frontages, particular attention will be paid to the massing and architectural style of the buildings, so that they contribute positively to the quality and the character of the development.

Green Infrastructure

3.20 The detailed road design is accompanied by detailed landscape proposals whilst a wider landscape strategy (set out within the DAS and Illustrative Masterplan) will provide the landscape principles which will underpin the principles for landscape design through the outline area of the proposal.

3.21 The Parameters Plan demonstrates how a central area of open space will be provided within residential element of the development. Soft landscaping will also be incorporated to provide green linkages between areas of open space.

3.22 Sustainable Urban Drainage Systems (SuDS) will also be provided along the northern boundary, to the rear of properties on Ravensthorpe Road, and at the north east of the Site and alongside the proposed spine road and roundabout.

3.23 As above, the woodland on the western extent of the Site will be retained and managed as an important Biodiversity Opportunity Zone and Strategic Green Infrastructure Network, the area will be protected from any impacts associated with the proposed development.

Development Strategy

3.24 The DAS demonstrate in broad terms how the Site could potentially be developed in the future. It should, however, be noted that the illustrative information within the DAS is indicative and the mix, size, layout and appearance of the homes, together with details of public open space, landscaping and boundary treatments are reserved for future approval.

3.25 Nonetheless, the DAS demonstrates that the Site can deliver up to 350 homes. The specific mix of homes is not a matter for approval under the terms of the outline element of the planning application, however, it is envisaged that the scheme will a range of house types and sizes to reflect local housing demand.

3.26 It is proposed that the development will provide for a policy compliant affordable housing offer on Site of a minimum of 20% affordable housing in line with the definitions within Annex 2 of the NPPF. The precise tenure split of the affordable dwellings, arrangements for their delivery, and mechanisms to ensure that those dwellings remain affordable in the longer terms will be dealt with through negotiation with the Local Planning Authority as part of the determination of the application.

Movement Strategy

3.27 The DAS demonstrates how the internal road layout could be provided in accordance with the Council's highway design standards and national guidance which places the needs of pedestrians and cyclists before motorised forms of transport.

3.28 A clear layout and hierarchy of streets and other routes is proposed and will help individuals to find their way around the development. Safe and direct routes with visible destinations and clear signposting will be used to encourage people to walk and cycle. Further details regarding the proposed movement strategy is set out within the accompanying Design and Access Statement, Transport Assessment and Travel Plan, which have been prepared in support of the planning application.

Landscaping Strategy

3.29 The layout of the Site has been designed to reflect the Site's topography and to retain, as far as possible, the existing landscape features, including trees and hedgerows. Where the removal of trees and hedgerows is necessary suitable mitigation is proposed. The proposed development is accompanied by a BNG assessment which demonstrates how the scheme is capable of delivering a 10% improvement in biodiversity at the Site. The development will include a total of 18.8ha of open space, creating an attractive setting for the development and providing opportunities for recreation and play; as well as ecological enhancement.

3.30 The Parameters Plan also provides for a dedicated area of central public open space which will include areas for children's play area.

3.31 Further to this, following consultation with the Lead Local Flood Authority (LLFA), the Parameters Plan demonstrates how SuDS will be delivered at the Site, along the northern boundary and on the north eastern extent of the Site. Particularly on the northern boundary, the SuDS will create a landscaped wildlife corridor and provides a buffer between the development and the existing properties located on Ravensthorpe Road.

4.0 PRE-APPLICATION CONSULTATION

Introduction

4.1 This Section provides an overview on the engagement and consultation methods which have been employed by the Applicant during the pre-application process. Detailed feedback and the Applicant's response is enclosed in the Statement of Community Involvement (SCI), which has been prepared and submitted in support of the planning application.

Planning Policy and Legislative Context

4.2 The Localism Act 2011 affirms the need for developers to engage in pre-application consultation with local communities prior to the submission of a planning application (for certain types of development).

4.3 The National Planning Policy Framework (NPPF) (2021) takes forward the legislative requirements of the 2011 Act, Paragraph 39 reiterates:

> *"early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improves outcomes for the community."*

4.4 As well as developers, the NPPF goes on to state that Local Planning Authorities:

> *"have a key role to play in encouraging other parties to take maximum advantage of the pre-application stage […]. They should also, where they think this would be beneficial, encourage any applicants who are not already required to do so by law to engage with the local community and, where relevant, with statutory and non-statutory consultees."*

4.5 The Government published the National Planning Practice Guidance (NPPG) on 6th March 2014. This effectively provides supplementary guidance to the NPPF in the shape of a web-based resource which is regularly updated.

4.6 The NPPG sets out the need for a collaborative process between applicants and other interested parties. These may include the following:

- The local planning authority;
- Statutory and non-statutory consultees;
- Elected members; and
- Local people.

4.7 There is recognition that the parties involved at the pre-application stage will vary on a case-by-case basis, and the level of engagement should be proportionate to the nature and scale of a proposed development. Each party is identified as having an important role to play in ensuring the efficiency and effectiveness of the pre-application engagement.

4.8 Kirklees Council have published a Development Management Charter (2015), which advises applicants to engage in pre-application discussions with the Council to obtain an initial informal view regarding the proposed development.

4.9 The Development Management Charter sets out that the Council encourages seeking pre-application advise and undertaking pre-application consultation for major and potentially controversial applications. Pre-application consultation will usually be appropriate for schemes where:

- The proposals are likely to have a significant impact on the environment or on the local community; and / or
- The development is likely to attract significant local interest.

4.10 The Council also adopted their own SCI in December 2019. The SCI sets out what the Council will do to meet the requirements for community consultation set out in national legislation and Government guidance.

4.11 The SCI does not set out a requirement for developers to undertake pre-application community consultation, but is clear that there are benefits of pre-application to the community.

4.12 In light of the above, the Applicant has undertaken an extensive programme of pre-application consultation with the local authority and the local community. The engagement methods and techniques used by the Applicant and its consultant team is outlined below.

Engagement with Officers at Kirklees Council and Technical Consultees

4.13 Officers at the Council remained integral to both the consultation process and the design evolution of the scheme and the preparation of the Planning Application. Maintaining a good level of communication and engagement with Officers enables them to share the benefit of their local knowledge to influence strategies whilst also enabling them to add value to the consultation process and enhance the Applicant's engagement with members of the public.

4.14 A formal pre-application request letter was submitted to the Council on 21st May 2021 and has formed the basis of a number of informal virtual meetings with planning officers as well as discussions with the Local Highways Authority (LHA), Lead Local Flood Authority (LLFA) and environmental health teams; either through planning officers or directly between the Applicant's technical team and the Council's consultees.

Pre-application Consultation with the Local Community

4.15 To engage with the local community, the Applicant launched a public consultation in relation to the emerging proposals, which took place between 21st June and 1st August 2021.

4.16 Due to restrictions associated with the COVID-19 pandemic, the consultation was held virtually, via a dedicated consultation webpage (www.riversidedewsbury.co.uk), online questionnaire form and through a live online interactive session (6th June between 11am and 7pm) using an online chat function.

4.17 The public consultation ran alongside the Council's Place Standard Consultation (https://howgoodisourplace.org.uk/2018/07/10/what-were-doing/). Place Standard is a tool supports ongoing consultation with local communities regarding their street, neighbourhood or town. Between 21st June and 1st August, the Council launched the 'Listening to Thornhill Lees' and 'Listening to Ravensthorpe' Place Standard Consultation.

4.18 The Place Standard Consultation covered a wide range of topics, including the development proposals, and was subject to extensive advertisement by the Council. Advertising methods included online promotion, banners and posters in key locations across the community and the distribution of letters and questionnaires to local households. To maximise inclusivity, the Place Standard Consultation material was

available in a range of languages, including English, Urdu, Romanian, Hungarian and Polish.

4.19 By running the consultations concurrently, the Applicant was able to collate the responses of both allowing the design team to factor these into the design evolution of the proposed development.

4.20 The public consultation was advertised on the Council's portal and via the Place Standard Consultation, as well as through a Dewsbury Riverside Article and social media. Between 28th June and 19th July 2021, the Council advertised the consultation eight times on social media. These social media posts generated the following significant activity:

- 858 total clicks
- 210.8k reach
- 43.8k impressions
- 2.69% engagement rate.

4.21 During the period of consultation, a total of 151 questionnaire responses were received, alongside 36 online questions and 9 email responses. No responses were received via telephone or post.

4.22 The public consultation uncovered a number of key issues, that were raised by the local community and interested parties, including:

- The relocation of the Masjid/playgroup
- Increased pressure on highways infrastructure and traffic
- Loss over greenfield / Green Belt land
- Increased pressure on local facilities (schools, doctors etc.)
- Flood Risk

4.23 The Applicant responded to these issues in a formal statement, which was published on the dedicated Dewsbury Riverside website. Each of the above matters is comprehensively addressed within the planning application submission package and the suite of technical documents that accompany it.

4.24 For completeness, the full programme of pre-application consultation undertaken by the Applicant, the feedback and how this was responded to, is set out within the accompanying SCI, which has been submitted in support of the planning application.

Summary

4.25 Whilst engaging with the local planning authority and community is not a statutory requirement, it is strongly encourage within both national legislation and policy and local guidance, including the Council's Development Management Charter.

4.26 The Applicant has used a range of communication methods and activities to engage in discussion about the emerging proposals for the Site. The open and transparent approach to consultation has ensured that as many people as possible have been made aware of the emerging proposals. The engagement process was designed to encourage as much comment and feedback as possible on the proposals and to understand where the proposals were supported, as well as where they could be improved.

4.27 The Applicant has fully embraced the opportunity for pre-application engagement, and the feedback received has been taken into consideration as part of the planning application. Full details of how the Applicant has responded to the feedback received is contained within the SCI and DAS, submitted in support of the planning application.

5.0 PLANNING POLICY CONTEXT

5.1 For decision-taking Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

5.2 The statutory development plan for the purposes of determining this planning application comprises:

- Kirklees Local Plan: Strategies and Policies (2019); and
- Kirklees Local Plan: Allocation and Designations (2019)

5.3 A summary of the relevant policies from the development plan are set out below.

Kirklees Local Plan: Strategies and Policies (2019)

5.4 The Strategies and Policies Document was adopted in February 2019, and forms Part 1 of the Local Plan. Part 1 of the Local Plan contains the spatial strategy and development management policies, which should be used in the determination of planning applications. The Local Plan covers the administrative area of Kirklees, which the exception of the Peak District National Park, and plans for the period between 2013 – 2031.

5.5 **Policy LP1: Presumption in favour of sustainable development** confirms that the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF when considering development proposals. Proposals that accord with the policies in the Kirklees Local Plan will be approved without delay, unless material considerations indicate otherwise.

5.6 **Policy LP2: Place shaping** requires all development proposals to build on the strengths, opportunities and help to address challenges identified in the Local Plan, in order to protect and enhance the qualities which contribute to the character of these places.

5.7 The Spatial Development Strategy for the borough indicates that the Council will seek to achieve sustainable housing growth through the delivery of a minimum of 31,140 new dwellings over the plan period, which equates to 1,720 dwellings per annum. During the plan period, Dewsbury is expected to deliver approximately 4,650 dwellings, and a

further 2,130 dwellings are expected to be delivered beyond the plan period. This includes the strategic allocation at Dewsbury Riverside.

5.8 **Policy LP3: Location of new development** requires development proposals to reflect the Spatial Development Strategy, as well as Policies LP1 and LP2.

5.9 **Policy LP4: Providing infrastructure** confirms that the Council will work with partners to bring forward the necessary and proportionate essential and desirable infrastructure that is required to deliver the spatial strategy.

5.10 **Policy LP5: Masterplanning sites** requires masterplans to involve all the relevant stakeholders, including the Council, landowners, developers, the local community, service providers and other interested parties. Masterplans will be developed in consultation with the Council prior to the submission of a planning application. Policy LP5 also sets out a design criteria that masterplans are expected to achieve.

5.11 **Policy LP7: Efficient and effective use of land and buildings** seeks to ensure housing density ensures efficient use of land, in keeping with the character of the area and design of the scheme and sets out that developments should achieve a net density of at least 35 dwellings per hectare (dph), where appropriate. Lower densities will only be acceptable if it is demonstrated that this is necessary to ensure that the development is compatible with its surroundings, development viability would be compromised or to secure particular house types to meet local housing needs.

5.12 **Policy LP9: Supporting skilled and flexible communities** and workforce encourages, wherever possible, proposals for new development to contribute to the creation of local employment opportunities within the district, with the aim of increasing wage levels and to support growth in the overall proportion of the districts' residents in education or training.

5.13 **Policy LP11: Housing Mix and Affordable Housing** requires all proposals for housing to be of a high quality and design and contribute to creating mixed and balanced communities in line with the latest evidence of housing need.

5.14 The Policy goes on to state that all proposals for housing must aim to provide a mix (size and tenure) of housing suitable for different household types, which considers the latest evidence of the need for different types of housing.

5.15 With regards to affordable housing, Policy LP11 requires that, on developments of more than 10 homes, 20% of the total units should be available for affordable tenure. The affordable homes should be incorporated within the development, but where justified, a financial contribution of at least equal value may be accepted to provide affordable homes elsewhere or to re-use/improve the existing housing stock.

5.16 The Site is located within Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone, which is designated under **Policy LP19: Strategic transport infrastructure** (ref. TS5). The Council will safeguard land to ensure that the strategic transport schemes can be delivered.

5.17 **Policy LP20: Sustainable travel** seeks to ensure that the need to travel is reduced, and that essential travel needs can be met by forms of sustainable transport other than the private car. The Council will support development proposals which can be served by alternative modes of transport such as public transport, cycling and walking, and new residential development should be located close to local facilities.

5.18 Policy LP20 also states that Travel Plans will normally be required for all major planning applications. Travel Plans should set targets and monitoring arrangements to ensure sustainable travel patterns are maintained.

5.19 **Policy LP21: Highways and access** requires proposals to demonstrate that they can accommodate sustainable modes of transport and be accessed effectively by all users. Proposals are required to demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network.

5.20 **Policy LP22: Parking** confirms that, car parking provision in new developments will be determined by the availability of public transport, the accessibility of the site, location of the development, local car ownership levels and the type, mix and use of the development. The provision of car parking in new developments should incorporate flexibly designed minimum parking spaces for private cars, and consider a range of solutions to provide the most efficient arrangement of safe, secure, convenient and visually unobtrusive car parking within the site, including a mix of on and off street parking.

5.21 Policy LP22 goes on to state that provision should also made for cycle parking, and the needs of disabled people for the parking of vehicles.

5.22 Core walking and cycling routes are identified along the north western and eastern boundaries of the Site under **Policy LP23: Core walking and cycling network**. Policy LP23 states that the core walking and cycling network will be safeguarded and extended to provide opportunities to reduce the number of car journeys and to link settlements, employment sites and transport hubs. Proposals that may prejudice the function, continuity or implementation of the core walking and cycling network will not be permitted, and instead proposals should seek to integrate into the existing network.

5.23 **Policy LP24: Design** confirms that good design should be at the core of all proposals and should be considered at the outset of the development process, ensuring that design forms part of a pre-application consultation of a proposal. Policy LP24 also sets out a design criteria in which proposals should adhere to in promoting good design.

5.24 **Policy LP27: Flood risk** requires proposals to be supported by an appropriate site specific Flood Risk Assessment in line with national planning policy. The Flood Risk Assessment must take account of all sources of flooding and demonstrate that the proposal will be safe throughout the lifetime of the development (taking account of climate change). The proposal must not increase flood risk elsewhere and where possible should reduce flood risk.

5.25 **Policy LP28: Drainage** sets out the Council's presumption that Sustainable Drainage Systems will be integrated in proposals and a presumption against the pumping of surface water. Policy LP28 confirms that development will only be permitted if it can be demonstrated that the water supply and waste water infrastructure requires is available or can be co-ordinated to meet the demand generated by new development.

5.26 **Policy LP30: Biodiversity & Geodiversity** seeks to protect and enhance the biodiversity and geodiversity of Kirklees, including the range of international, national and locally designated wildlife and geological sites, Habitats and Species of Principle Importance and Kirklees Wildlife Habitat Network. The Site lies within a Biodiversity Opportunity Zone: Pennine Foothills, as designated by the Kirklees Proposals Map.

5.27 Development proposals will be required to:

i. *"Result in no significant loss or harm to biodiversity in Kirklees through avoidance, adequate mitigation or, as a last resort, compensatory measures secured through the establishment of a legally binding agreement;*

ii. *Minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where the opportunities exist;*

iii. *Safeguard and enhance the function of connectivity of the Kirklees Wildlife Habitat Network at a local and wider landscape-scale unless the loss of the site and its functional role within the network can be fully maintained or compensated for in the long term;*

iv. *Establish additional ecological links to the Kirklees Wildlife Habitat Network where opportunities exist; and*

v. *Incorporate biodiversity enhancement measures to reflect the priority habitats and specifies identified for the relevant Kirklees Biodiversity Opportunity Zone."*

5.28 The western extent of the Site lies within a Strategic Green Infrastructure Network: River Calder Corridor, as designated under **Policy LP31: Strategic Green Infrastructure Network.** Policy LP31 states that priority will be given to safeguarding and enhancing green infrastructure networks, green infrastructure assets and the range of functions they provide.

5.29 **Policy LP32: Landscape** requires all proposals take into account and seek to enhance the landscape character of the area.

5.30 **Policy LP33: Trees** states that the Council will not grant planning permission for development which directly or indirectly threaten trees or woodlands of significant amenity. Proposals are required to comply with relevant national standards regarding the protection of trees in relation to design, demolition and construction. Where tree loss is deemed acceptable, developers will be required to submit a detailed mitigation scheme.

5.31 **Policy LP38: Mineral safeguarding** seeks to protect the impacts of surface development on mineral resources, particularly in Mineral Safeguarding Areas.

5.32 **Policy LP43: Waste management hierarchy** encourages the minimisation of waste production, and supports the re-use and recover of waste materials.

5.33 **Policy LP47: Healthy, active and safe lifestyles** confirms that the Council aims to create an environment which supports healthy, active and safe communities and reduces inequality. The Policy sets out a checklist of how this will be enabled, which includes, but is not limited to, supporting initiatives which enable or improve access to healthy food, supporting energy efficient design and location of development and increasing access to green spaces and green infrastructure.

5.34 **Policy LP48: Community facilities and services** requires community facilities to be provided in accessible locations where they can minimise the need to travel or they can be made accessible by walking, cycling and public transport. Proposals will be supported for development that protects, retains or enhances provision, quality or accessibility of existing community, education, leisure and cultural facilities that meets the needs of all members of the community.

5.35 Policy LP48 sets out that proposals which involve the loss of valued community facilities such as shops, public houses and other facilities of value to the local community will only be permitted where it can be demonstrated that:

a) there is no longer a need for the facility and all options including the scope for alternative community uses have been considered; or
b) its current use is no longer viable; or
c) there is adequate alternative provision in the locality to serve the local community which is in an equally accessible location; or
d) an alternative facility of equivalent or better standard will be provided, either on-site or equally accessible; and
e) any assets listed on a Community Asset Register have satisfied the requirements under the relevant legislation.

5.36 **Policy LP49: Educational and health care needs** states that, where the scale of development proposed may impact on education and health provision, the Council will actively work with applicants to resolve key planning issues in advance of a planning application being submitted.

5.37 LP49 goes on to state that the need for the provision of additional school places will be a material consideration when proposals for new housing development are considered. Developers should work with the council at the earliest opportunity to ensure the phasing of development and appropriate mitigation is identified in a timely manner to ensure education provision can be secured.

5.38 **Policy LP51: Protection and improvement of local air quality** states that development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in air pollution which would have an unacceptable impact on the natural and built environment or to people.

5.39 **Policy LP52: Protection and improvement of environmental quality** requires proposals which have the potential to increase pollution from noise, vibration, light, dust, odour, shadow flicker, chemicals and other forms of pollution to be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce that pollution.

5.40 **Policy LP63: New open space** seeks to secure well-designed new and improved open space, sport and recreation facilities in the district. New housing developments will be required to provide or contribute towards new open space or the improvement of existing provision in the area, unless the developer clearly demonstrates that it is not financially viable. The supporting text to Policy LP63 sets out the Council's open space requirements by typology.

Kirklees Local Plan: Allocation and Designations (2019)

5.41 The Kirklees Local Plan: Allocation and Designations was adopted in February 2019 and forms Part 2 of the Kirklees Local Plan. The Part 2 document contains allocations and designations, subdivided into different categories and areas.

5.42 Policy LP65 sets out the sites which are allocated for housing. Planning permission for these sites will expected to be granted if the proposals accord with the development principles set out within the Local Plan.

5.43 The Application Site forms part of the wider allocation for Dewsbury Riverside under allocation ref. HS61. HS61 is expected to deliver 1,869 dwellings during the Local Plan period, with potential for a further 2,131 dwellings beyond the plan period. Policy LP65 sets out the constraints, site specific considerations and reports required to support any planning application at the site. This is attached at **Appendix 1**.

5.44 The Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone is allocated as Site TS5 for transport improvements. The improvements to this area include:

- Area wide and corridor highway, public transport, cyclist and pedestrian improvements to address local congestion issues and the associated impact of a large housing allocation in South Dewsbury and a large mixed use allocation in Chidswell.
- There will be improvements to the A644 and its environs. This may include the provision of a new highway to the south of Dewsbury through the housing allocation site and a new highway link to the existing network.
- There will be improvements along the A653 corridor between Dewsbury and Leeds, in particular at the junction of the A653 and B6128 (Shaw Cross) to facilitate improvements to bus and car journey times between Dewsbury and Leeds, proving more efficient journeys to Leeds city centre, White Rose, Aire Valley and the M62 corridor and to accommodate a major mixed-use allocation in Chidswell.
- Junction improvements and road space reorganisation along the A652 in Batley which will provide benefits for all road users.

Other Material Considerations

5.45 In accordance with Section 38(6) of Planning and Compulsory Purchase Act, it is necessary to consider any other material considerations which are relevant to the application.

5.46 The following documents are considered relevant to the determination of this application:

- The National Planning Policy Framework (2021)
- National Planning Practice Guidance
- Housebuilders Design Guide SPD
- Open Space SPD
- Highway Design SPD
- Affordable Housing SPD
- Interim Affordable Housing Policy 2020

5.47 A summary of each is set out below.

National Planning Policy Framework (NPPF) (2021)

5.48 The National Planning Policy Framework (NPPF) was published by the Government in July 2021. This amended version makes minor alterations to the third addition of the NPPF published by the Government in February 2019.

5.49 The following sections of the NPPF are considered relevant to the proposed development:

- Presumption in favour of sustainable development (paragraph 11)
- Decision taking (paragraph 47)
- Planning conditions and obligations (paragraphs 55 and 56)
- Expectation for 10% of major housing developments to be available for affordable home ownership, as part of affordable housing contribution (paragraph 65)
- Decisions should aim to achieve healthy, inclusive and safe places (paragraph 92)
- Access to a network of high-quality open space is important for the health and wellbeing of communities (paragraph 98)
- Transport issues and sustainable travel (paragraphs 104, 110 – 112)
- Making efficient use of land to meet the need for different types of housing (paragraph 122)
- Avoid homes being built at low densities and ensure that development make optimal use of land (paragraph 124)
- Achieving well designed places (paragraph 130)
- Flood risk (paragraph 167)
- Conserving and enhancing the natural environment (paragraphs 174 and 179)
- Effects of pollution created by the development on health, living conditions and the natural environmental (paragraph 185)

National Planning Practice Guidance

5.50 The Department for Communities and Local Government (DCLG) published National Planning Practice Guidance (NPPG) in March 2014. The NPPG provides supplementary guidance on the application of policy contained in the NPPF.

5.51 The following PPG have been taken into consideration as part of this Application:

- Air Quality.
- Design.

- Determining a planning application.
- Effective use of land.
- Healthy and safe communities.
- Housing supply and delivery.
- Natural Environment.
- Noise.
- Planning Obligations.
- Travel Plans, Transport Assessment and Statements.

Housebuilders Design Guide Supplementary Planning Document (June 2021)

5.52 Kirklees Council adopted their House Builders Design Guide Supplementary Planning Document (SPD) in June 2021. The purpose of the document is to set out what the Council considers to be good residential design, to raise the quality of housing that is delivered across the district.

5.53 The SPD sets out 19 design principles which developers should give consideration to when designing residential development.

Open Space Supplementary Planning Document (June 2021)

5.54 The Open Space SPD was adopted by the Council in June 2021 and sets out the Council's minimum requirement for open space provision in new residential development.

5.55 The Council will encourage new housing developments to follow ten key principles, aimed at achieving open spaces which are well-designed, well located, well maintained and achievable for all users, to meet local needs. The ten principles are set out below:

1. Meeting local needs
2. Assessment of existing provision
3. Kirklees open space standards
4. Design
5. Multi-functional benefits
6. Connectivity
7. Comprehensive provision and cumulative impact
8. Location
9. Financial contributions
10. Maintenance and management

5.56 New housing development of 10 or more dwellings will be expected to provide and/or contribute towards new or enhanced open space, sport and recreation facilities. For new developments that form part of a wider housing site, the policy requirement will be applied to the total side area to be developed or available for housing and proportionate open space provision will be sought.

5.57 Kirklees open space requirements are set out in Table 3 below.

Table 2: Kirklees Open Space Standards

Type of Open Space	Quantity Standard (minimum)		Quality Standard	Accessibility Standard
	Amount per 1,000 population (ha)	**Amount per dwelling (sqm)**	**Site Assessment Rating**	**Within the following walk time/distance for residents**
Parks and recreation grounds	0.8	19.44	High	15 minutes / 720 metres
Natural and semi-natural greenspace	2.0	48.6	High	15 minutes / 720 metres
Amenity greenspace	0.6	14.58	High	10 minutes / 480 metres
Allotments	0.5 per 1,000 households	5	High	15 minutes / 720 metres
Children's play areas	0.25	6.1	N/A	15 minutes / 720 metres
Young people's provision	0.3	7.3	N/A	2km

5.58 With regards to open space requirements within new residential development, all developments of eleven or more dwellings will be expected to include usable, accessible amenity greenspace which is available to the public, based on the standard 14.58sqm per dwelling, as well as equipped play facilities or designated play space in accordance with the guidelines set out in Table 3 below.

Table 3: Kirklees guidance for equipped/designated play space

No. of dwellings	Local Area of Play (LAP)	Locally Equipped Area of Play (LEAP)	Neighbourhood Equipped Area of Play (NEAP)	Multi-use Games Area (MUGA)
1-10	No	No	No	
11-50	Yes	No	No	
51-200	No	Yes	No	
201-500	Yes	Yes	No	Contribution*
501+	Yes	Yes	Yes	Yes

*Calculation based on the number of dwellings above 200 at £500 per dwelling.

Highway Design Supplementary Planning Document (November 2019)

5.59 The Highway Design SPD was adopted by the Council in November 2019 and promotes high standards of highway design that reflect nationally recognised best practice and facilitate the delivery of high quality residential, employment and mixed use development across Kirklees. The SPD outlines the highway design considerations that should be taken int account in advance of preparing a schemes layout.

5.60 The SPD provides guidance on prioritising pedestrians; cycling infrastructure; streets; landscape and water; parking; and servicing.

Interim Affordable Housing Policy (January 2020)

5.61 The Interim Affordable Housing Policy document provides guidance on the implementation of the Kirklees Local Plan Housing Mix Policy (LP11) and confirms the Council's position that the proportion of affordable homes on market housing sites of more than 10 dwellings should be 20% of total units.

5.62 The affordable housing provision should:

a) *"Cater for the type of affordable need identified in the latest housing evidence in terms of type, tenure, size and suitability to meet the needs of specific groups, taking into account evidence in the Kirklees SHMA (2016) which states:*

- *Evidence of the need for an affordable housing split of 55% Affordable Rent and 45% Intermediate Tenure*
- *Evidence of the affordable needs by SHMA sub-area and property size*

b) Incorporate appropriate arrangements to retain the benefits of affordability for initial and subsequent occupiers or for the subsidy to be recycles for alternative housing provision; and

c) Be indistinguishable from market housing in terms of achieving the same high quality of design. "

Summary

5.63 The focus of Kirklees Local Plan is to deliver sustainable development (balancing economic, social and environmental priorities) and by making efficient and effective use of land and buildings supported by necessary infrastructure and with minimal effect on the environment.

5.64 The Site forms part of the wider housing allocation HS61 for Dewsbury Riverside, which allocates 1,869 dwellings during the Local Plan period, with potential for a further 2,131 dwellings beyond the plan period. With this in mind, the principle of residential development at the Site is considered acceptable.

5.65 There are also several other policies from the Local Plan and material considerations that are relevant to this Application. Our assessment against these policies and guidance is set out in Section 7 of this Statement.

6.0 AFFORDABLE HOUSING STATEMENT

Planning Policy Context

6.1 Paragraph 60 of the NPPF reiterates the Government's commitment to significantly boost the supply of homes to meet both market and affordable needs. The Council's Interim Affordable Housing Policy document (2020) provides guidance on the implementation of the Kirklees Local Plan Housing Mix Policy (LP11).

6.2 The document confirms the Council's position that the proportion of affordable homes on market housing sites of more than 10 dwellings should be 20% of total units. The Council's SPD sets out the affordable housing split should comprise 55% affordable rent and 45% intermediate tenure and those dwellings should be indistinguishable from market housing in terms of achieving the same high quality of design.

Compliance with Local Policy and Guidance

6.3 Notwithstanding that the housing element of the planning application is in outline, with detailed housing numbers and mix reserved for future consideration, the Applicant is committed to delivering policy compliant affordable housing.

6.4 Given that the parameters of the indicative masterplan submitted in support of this application demonstrate that the Site can accommodate up to 350 dwellings, the approximate affordable housing provision at the Site will be up to 70 dwellings. It is envisaged that these will be provided on Site to meet the needs of the local community.

6.5 Detailed considerations regarding the appearance, location and tenure of those affordable dwellings will be subject to further dialogue with the Council and will be confirmed in a future reserved matters application. We propose that the tenure of the affordable housing should be considered flexibly and should comprise affordable housing within the definitions set out within Annex 2 of the NPPF.

Summary

6.6 The proposed development accords with the affordable housing requirements set out in local and national policy. Detailed affordable housing considerations, such as the appearance, location and tenure will be subject to a future reserved matters application.

6.7 The Applicant is committed to ongoing engagement with the Local Planning Authority to ensure that the proposed development delivers affordable housing in line with the Council's requirements.

7.0 PLANNING ASSESSMENT

Introduction

7.1 Having regard to the development plan and material considerations outlined in Section 5 of this Statement, we have identified as part of our assessment the following key issues:

- The Principle of Development;
- Highways and access;
- Community assets;
- Design;
- Landscape; and
- Ecology and Trees.

Principle of Development

7.2 The Site is allocated for residential development under Policy LP65 of the Local Plan. The Site forms part of wider housing allocation HS61 which has a gross site area of 161.37 hectares and is expected to deliver 1,869 dwellings during the Local Plan period with a further 2,131 dwellings beyond the plan period.

7.3 The proposed development has regard to the site-specific considerations set out within the allocation extract at **Appendix 1**, but are listed below for reference:

- *Replacement allotment provision of equivalent or better quantity and quality will be required in a suitable location as part of the development.*
- *Landscape character assessment has been undertaken for this site which should be considered in the development masterplan.*
- *Site requires a drainage masterplan*
- *Early Years and Childcare provision will be required relating to this allocation.*
- *The provision of one new 2 form entry primary school will be required during the plan period with further 2 form entry capacity required beyond the plan period.*
- *The provision of secondary school places will be monitored and delivered to meet demand as new housing is delivered during and beyond the plan period. The masterplan will safeguard land for future secondary school provision beyond the plan period should the need arise.*

- *Recreational and biodiversity – new areas of public open space, green infrastructure and habitats required.*
- *The site will play a key role in helping transform Dewsbury and Ravensthorpe. Proposals should indicate how the place shaping strengths, opportunities and challenges can be addressed through reference to policies in the Local Plan, the Dewsbury Strategic Framework and other regeneration and urban renaissance strategies and initiatives.*
- *The site requires the provision of multiple access points and will need to carefully phased to ensure it complies with other policies in the Local Plan regarding transport.*
- *Proposals for this site should also contribute towards:*
    - *Improved rail, road, pedestrian and cycle connections*
    - *Improvements to Ravensthorpe Station and surrounding area*
    - *Delivery of landscape and environmental enhancements*
    - *Services and infrastructure*
    - *Mirfield Promenade Strategic Green Infrastructure proposals (SGI2110)*
- *Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening.*
- *In accordance with LP13 (part a, paragraph 4) the creation of a new local centre commensurate with the scale of growth proposed will be supported, subject to the sequential test and impact assessment.*
- *Proposals for this stie will need to take account of TS5 Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone.*
- *The council will monitor the implementation of the early phases of delivery to manage the options and need for strategic highways intervention in advance of the 2000th dwelling.*
- *A landscape buffer along the southern boundary of the site is required.*

- *A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.*

7.4 Should these considerations be satisfied, it is considered that the principle of development at the Site is appropriate. Set out below is how the proposed development has responded to these considerations.

Allotments

7.5 The replacement of the existing allotments, which are currently located at the north east corner of the Site, is subject to a separate planning application (ref. 2021/62/90552/E), which was submitted by Kirklees Council in February 2021 and approved in June 2021. The new allotments are to be relocated to the west of Ravenshall School and accessed from Ravensthorpe Road.

7.6 The relocation of the allotments has been facilitated by the Applicant and the allotment land will also form part of the overall drainage strategy for the Site. The proposed development has regard for the approved allotment scheme.

Landscape Character

7.7 A Landscape and Visual Impact Assessment has been prepared by DEP and submitted in support of the Application. In addition, the DAS sets out how the landscape character of the area has been taken into account within the proposed development.

7.8 The contents of the LVIA and DAS will not be repeated here save to say that the Site contains many landscape features, including woodlands, allotments, intact hedgerows and quality trees. These features will be integrated into a wider open space network wherever possible and will enhance the existing footpath/bridleway network.

7.9 There are a limited number of long distance views from public locations, and some long distance views from residential properties. Local receptors will experience a change of view, both from residences bordering the masterplan area, and people using the footpath and bridleway network.

7.10 The development proposals can be successfully integrated into the landscape by incorporating the following features:

- Creates a strong landscape buffer along the southern boundary of the site;

• Retains important existing landscape features, such as woodland, in-tact hedgerows, quality isolated trees where possible;
• Replaces and enhances the existing footpath and bridleway (claimed) network.
• Create a series of landscape corridors lining the footpath network to maintain the existing links between the residential areas and the open countryside.
• Include a comprehensive Landscape Design Strategy with the development proposals which provides for a quality landscape design, an open space design strategy, street hierarchy and character areas, and a landscape management strategy

7.11 The area of woodland, known as Lady Wood, located on the western extent of the Site, has been retained as part of the proposed development, and management measures will be put into place to ensure that there is a net gain in biodiversity within the area.

7.12 The Policy also requires a landscape buffer along the southern boundary of the allocation. The Site subject of this application is located on the northern extent of the wider allocation and therefore, whilst the scheme does provide a landscape buffer to the southern boundary of the Site, the landscape buffer for the wider allocation will necessarily be delivered by the future phases of the Dewsbury Riverside scheme.

Drainage

7.13 A Flood Risk Assessment and Drainage Strategy has been prepared in support of the application.

7.14 Sustainable Urban Drainage Systems (SuDS) have been proposed as part of the parameters of the scheme following a SuDS suitability assessment. Numerous types of SuDS have been assessed through the scheme's preparation including SuDS which are primarily: conduits (convey water from one location to another), attenuation (stores water) and source control (collects water at source). Most notably are the proposed attenuation areas located on the northern boundary of the Site, to the rear of properties on Ravensthorpe Road.

7.15 Surface water will ultimately drain into existing infrastructure via an existing surface water sewer located in Ravensthorpe Road. This sewer is 200mm diameter and connects to a 1080mm diameter concrete pipe close to the junction with Lees Hall Road. The submitted Drainage Strategy outlines conversations with Yorkshire Water to agree a discharge rate according to the existing sewer capacity for the existing sewer in

Ravensthorpe Road and for the private system at the rear of the dwellings located off Ravensthorpe Road.

Educational requirements

7.16 To accommodate the highways infrastructure necessary to support the proposed development, it is necessary to remove the existing Early Years and childcare provision, at the Masjid Abubakr Mosque and playgroup hall. The proposed development allocates an area for community use which is capable of providing at least equal provision in terms of both quantity and quality of community facility.

7.17 Any detailed provision of a replacement community facility will be the subject of a reserved matters application. The potential of the Site to provide a replacement community facility to be operated by the trustees of the Masjid Abubakr Mosque and Lees Hall Playgroup is the subject of ongoing dialogue with those trustees. This is discussed in further detail later in this Planning Statement however, it is proposed that there will be no net loss of community facilities at the Site.

7.18 In terms of proposals for future education requirements, the first phase of development at the Site does not propose new educational facilities at early years or primary. As set out below, the delivery of a new primary school (2 form entry) is not necessitated by the first phase of development and therefore will be delivered as part of the wider allocation. Notwithstanding the above, the proposed development will provide the infrastructure required to open up the wider allocation at Dewsbury Riverside and facilitate the delivery of the wider allocation and will indirectly facilitate the provision of education facilities through baring the cost of early infrastructure delivery elsewhere.

7.19 The requirement for new education facilities was established through the evidence base for the Kirklees Local Plan which was adopted in 2019. That evidence base included the Council's Infrastructure Delivery Plan (2015) and further Addendum in 2016.

7.20 The 2016 IDP Addendum sets out that there are a number of ongoing and interlinked assessments that go into understanding the district wide need for education infrastructure with regard to proposed growth through the Local Plan. The IDP Addendum looks to understand the education infrastructure required in relation to each area of education between early years and secondary education to accommodate Local Plan growth and, in particular, in relation to the Dewsbury Riverside Allocation.

7.21 In relation to Primary School places, the IDP Addendum sets out that the allocation plans for approximately 2500 homes within the local plan period which is up to the year 2031, with a further 1500 homes to come after the plan period, resulting in a total of 4000 homes within the site boundary. The site falls within the Dewsbury South and Mirfield Primary Planning Areas. The Securing Sufficient School Places Document (2015) for Dewsbury South Primary Planning Area states that in the context of the potential impact of proposed strategic site development in the Local Plan, it is anticipated that there will be a requirement for additional primary places in future years through additional infrastructure. A more strategic approach to sufficiency planning may be required across a wider geographical area and should take into account existing capacity in existing schools.

7.22 Appendix A of the IDP Addendum 2016 sets out that a requirement for further primary school places is unlikely to be needed until some 15 years into the plan period. As set out within the Health Impact Assessment accompanying this application, the Local Plan evidence reflects current capacity in reality. Local primary schools within a reasonable walking distance to the Site demonstrate a current capacity of 87 primary school places. Using the Council's pupil calculator within the IDP Addendum 2016, a residential development of 350 homes would generate a need for 73.5 primary school places across years R-YR6. It is clear that there is sufficient capacity in existing primary schools to accommodate the proposed development.

7.23 In relation to early learning and childcare places the Council are undertaking on going work in relation to its Early Learning and Childcare Strategy and discussions have been on-going between the Early Learning and Childcare and Planning Policy Teams alongside school place planning discussions due to their integral interrelationship. The IDP 2016 sets out that Early learning and childcare needs are assessed using council ward boundaries and the phasing assessments for housing sites in the draft Local Plan have been considered by ward by the Early Learning and Childcare Team so that the impact of future growth promoted by the Local Plan can be assessed. In relation to Dewsbury South (and the Dewsbury Riverside Allocation) it is clear that there is significant future demand for early learning and childcare places (with later provision required for afterschool places). However, as set out within the IDP, afterschool provision would be best established at a similar time to a new primary school with one resource for 46 places being required. The IDP goes on to state that early learning and childcare should be situated on or very near to a primary school site and have its own secure outside play area.

7.24 As above, the proposed development secures sufficient area within the Site to provide equivalent early learning and childcare provision to that which will be removed at 555 Lees Hall Road; with potential to provide a more efficient building subject to detailed design. However, in lieu of provision of a new primary school, which will be required to be delivered alongside later phases of development, the first phase of development does not seek to provide additional early learning and childcare provision.

7.25 In relation to Secondary provision, Allocation HS61 requires that secondary school places will be monitored and delivered to meet demand as new housing is delivered during and beyond the plan period. The masterplan will safeguard land for future secondary school provision beyond the plan period should the need arise.

7.26 In the first instance, the Site boundary for the first phase of development does not include land previously envisaged for the provision of a new secondary school in allocating Dewsbury Riverside for development. Accordingly, the development does not negatively impact the ability of the allocation to safeguard land for provision of a secondary school in the future; indeed, through the provision of the southern spine road arm as part of the proposed development, the scheme will help to facilitate future delivery of a school if deemed necessary as part of future phases of development.

7.27 In terms of monitoring of secondary school places. the Site falls within the secondary planning Areas of Dewsbury and Cleckheaton, Heckmondwike, Liversedge & Mirfield. The Securing Sufficient School Places Document (2015) states that in the context of the potential impact of two proposed strategic site developments, one in Dewsbury East and Dewsbury South in the Local Plan, it is anticipated that there would be a requirement for additional secondary places over and above those already provided. Utilising the methodology within the IDP 2016 Addendum, it is envisaged that the proposed development of the first phase of Dewsbury Riverside could yield up to 35 additional secondary school pupils across the secondary age rage (YR7-11). As set out within the HIA accompanying this application, Secondary Schools at Westborough High and St John Fisher are currently over capacity and it is envisaged that the above pupils are likely to have to travel outside of the immediate catchment area to attend school.

7.28 Notwithstanding the above, the IDP sets out that a more strategic approach to sufficiency planning will be required across a wider geographical area, including in Batley, Birstall, Birkenshaw and Gomersal, and in Cleckheaton, Heckmondwike, Liversedge and Mirfield. This strategic planning is clearly the role of the LEA who will be consulted on the application and this process is not one that this Application can pre-

empt. Should the LEA conclude that the proposed development is required to make further provision towards Secondary School Places the scale or contribution and the mechanism for securing it will be the subject of negotiation with the LPA.

Recreation and biodiversity

7.29 In terms of recreation and open space, the indicative masterplan confirms that a variety of open space will be provided at the Site. A total of 18.8 hectares of green infrastructure and open space is proposed and principally include public open space, drainage features and retained and new planting.

7.30 Landscape is a reserved matter as part of the outline element of this application and the detailed landscape proposals and their typologies will be the subject of further consideration. However, as set out within the DAS submitted with the application, the proposed development is capable of delivering in excess of the Local Plan requirement for open space.

7.31 An Ecology Assessment and has been prepared in support of the application and confirms that the arable farming uses at the Site are generally of low quality in biodiversity terms; save for existing ecological features such as the woodland, trees and hedgerows. As set out earlier in this Statement, the scheme will seek to retain those notable landscape features where possible as well as providing the management of the woodland on Site. The Application is accompanied by a BNG Assessment which demonstrates that the Site is capable of delivering a net gain of circa 10% in biodiversity in accordance with local and national planning policy.

7.32 Furthermore, the proposed SuDS located on the northern boundary of the site will create a wildlife corridor which encourages biodiversity at the Site. The area of woodland on the western extent of the Site capable of providing habitat for priority species such as birds, bats and other forms of wildlife. The Ecology Assessment confirms that mitigation measures can be put in place to protect the area of woodland from any impacts of the proposed development.

Highways

7.33 Highway infrastructure has been proposed as the detailed part of this application. The Applicant has sought to meet the requirements of the Policy, and highways and access matters are discussed in detail below.

7.34 The above considerations and further detail contained within this Planning Statement confirm that the proposals are in accordance with Policy LP65 of the Local Plan and the principle of residential development at the Site is therefore considered acceptable. Detailed matters such as layout and appearance will be subject to future reserved matters application and it is the principle of development that should be assessed.

Highways and Access

7.35 The detailed part of the planning application comprises the development of an access roundabout and spine road, proposed from Forge Lane (including associated junctions and drainage); secondary access from Ravensthorpe Road; and road link which is capable of linking to the new roundabout junction proposed by Network Rail at the corner of Calder Road and Ravensthorpe Road. The secondary access from Ravensthorpe Road (noted as a preliminary access within the TA) is capable of delivering earlier phases of the development (up to 150 units) prior to the need to deliver the main Forge Lane Access (including the demolition of community facilities at the north-east corner of the Site).

7.36 The proposed points of vehicular access, pedestrian and cycle access to the Site will be facilitated via an enhanced footpath and cycleway network through the Site which will utilise existing footpath links and claimed bridleways where possible (or provide new and enhanced links where necessary) to link to the southern and northern boundaries of the Site.

7.37 The proposed access junctions have been designed to provide safe vehicular access to the Site in accordance with the Council's highways design guidance. The location of the junctions has been chosen to provide logical and safe internal circulation routes through the Site, with sufficient room for pedestrians, cyclists and vehicles to use the roads safely.

7.38 The allocation, alongside Local Plan Policies LP19, LP20, LP21, LP22, LP23 and transport improvement scheme TS5 requires satisfactory access and parking to be provided as part of all new development and requires consideration to be given to traffic generation and impact on the highway, alongside promoting sustainable modes of transport.

7.39 A Transport Assessment (TA) has been prepared to assess the Site's acceptability against these policies and the scope of the TA, which has been prepared and submitted alongside this application, has been informed by the requirements of the allocation.

7.40 The TA sets out that the site is well located to benefit from existing sustainable travel networks. It is reasonable to conclude that sustainable travel is a viable and attractive mode of transport for future residents of the site.

7.41 In terms of highways impact, a review of traffic data provided from the council's wide-area traffic model has been undertaken and the following junctions are proposed for detailed traffic modelling within the Transport Assessment:

- Forge Lane Access (Central Gateway);
- Ravensthorpe Road Access (Temporary residential access);
- Thornhill (double mini-roundabout);
- Brewery (mini-roundabout); and
- Ingham (priority T-junction).

7.42 Whilst detailed traffic models are proposed for the above junctions, a mitigation strategy is also proposed for the forecast Phase 1 impacts at the Gyratory.

7.43 Detailed junction analysis has been undertaken at the junctions within the study area on the local highway network. The preliminary and secondary site access points have been assessed at appropriate periods during the build-out to confirm that the access layouts are forecast to operate with suitable traffic capacity, including in 2048 for the (Forge Lane roundabout) access.

7.44 The junctions on the local highway network are forecast to operate with significant spare traffic capacity with and without development, with the exception of Thornhill. The Thornhill junction is forecast to have queues on the southern and northern approaches in the AM and PM peak hours, even prior to the Phase 1 development being implemented. The forecast impacts of the Phase 1 development are minimal, with the forecasts RFC similar in the with and without development scenarios.

7.45 A scheme of relining is proposed at the junction prior to the occupation of the 150th dwelling to maintain peak performance of the junction. Further consideration of junction improvement at this location is likely to be required as the full Dewsbury Riverside

scheme progresses and/ or as part of the wider Local Plan strategic highway improvement schemes.

7.46 The gyratory junction is not forecast to be materially impacted by the development proposals during the proposed Phase 1 delivery of Dewsbury Riverside. Even so, as a critical junction on the network, specific consideration has been given to the gyratory.

7.47 The gyratory has been the subject of a recent study by the highway authority as part of the M2D2L scheme and the junction itself is forecast to operate with spare traffic capacity, despite the queues observed on the approaches to the junction from the north and south.

7.48 A technical note has been provided to the LHA relating to the junction operation concludes that initial onsite observations suggest that additional queueing occurs on approaches to the junction as a result of:

- The proximity of the pedestrian crossings which are not synchronised to the main junction controller timings;
- Prescence of bus stop facilities located within the main traffic streams; and
- General friction of traffic flow based on frontage activity.

7.49 The M2D2L project aims to deliver improvements to junctions within the Local Plan period and, as such, it is reasonable to rely upon these future improvement works to the junction to aid with the delivery of the wider Dewsbury Riverside scheme and, indeed, Phase 1.

7.50 Even so, provision is to be made to improve the operation of the junction following the 210th dwelling on the site.

7.51 In addition to the above, a Travel Plan forms part of the planning application package and its delivery would need to be firmly committed to by the developer. The Travel Plan includes the provision of a Travel Plan Co-ordinator and sets out a number of SMART objectives which will seek to minimise single-occupancy car use, resulting in an initial target of 45% of travel to and from the site by sustainable travel modes within a five-year period.

7.52 Importantly, the target will include travel by ultra-low and zero emission vehicles. An extension of the Travel Plan by 2 years will be triggered if the target is to be met. A stretch target of 47% will be set, should the initial target be met within the period.

7.53 Crucially, as well as being acceptable in their own right, the detailed highways proposals have been designed to facilitate the future delivery of housing at Dewsbury Riverside during the current plan period and beyond. The Applicant proposes to front load the highways infrastructure costs of the application to the benefit of the wider allocation.

7.54 In summary, the proposals would provide a safe and suitable access into the Site for all users, encourage and promote sustainable modes of travel and would not result in a significant impact on the transport network. The proposals are, therefore, in accordance with Local Plan Policies LP19, LP20, LP21, LP22, LP23 and transport improvement scheme TS5, as well as the Council's highway design guidance and Paragraph 104 of the NPPF.

Community Assets

7.55 To accommodate the highways infrastructure necessary to deliver the proposed residential development, and the wider development of Dewsbury Riverside, it is necessary to remove the existing Mosque and playgroup building which are currently located on the north eastern corner of the Site.

7.56 Policy LP48 of the Local Plan requires new development to be supported by community facilities in accessible locations that meets the needs of all members of the community. The loss of valued community facilities will be permitted where there is adequate alternative provision in the locality to serve the location which is in an equally accessible location, or an alternative facilities of equivalent or better standard will be provided, either on site or equality accessible.

7.57 Accordingly, the proposed development includes an area designated for mixed use development which is capable of providing a replacement community facility to compensate for the loss of the community facilities at the Mosque and Playgroup building (including with enhanced access provision) ensuring that there will be no net loss of community facilities at the Site. Indeed, the area of land proposed for mixed uses is significantly larger than where the existing building is located and has the potential to provide significant enhancements in the provision of community infrastructure at the Site.

7.58 Any detailed provision of a replacement community facility will be the subject of a reserved matters application. As set out above, the proposed development has been

designed with the ability to provide an initial access point via Ravensthorpe Road to ensure that the initial phase of development does not require the removal of existing community facilities; allowing sufficient time for final proposals for community uses to be submitted. The potential of the Site to provide a replacement community facility to be operated by the trustees of the Masjid Abubakr Mosque and Lees Hall Playgroup is the subject of ongoing dialogue with those trustees.

7.59 By way of context, the Applicant is the owner of the car park for the Mosque and playgroup building. Accordingly, the Applicant is committed to engaging with the community and the trustees of the Mosque to agree with location and specification of replacement facilities. The relocation of the Mosque has been subject to ongoing dialogue with the trustees and it is clear from the response of the public consultation that the relocation of the Mosque is a key issue for the local community. Specific details of the consultation responses are contained within the Statement of Community Involvement, submitted in support of this application.

Design

7.60 Policies LP5 and LP24 of the Local Plan require development to come forward in line with a masterplan which has been subject to discussion with the Council. The masterplan should demonstrate how the proposal uses high-quality design considerations to achieve a strong sense of place. The Council's Housebuilders Design Guidance SPD provides further guidance on how high quality design can be achieved on development sites.

7.61 The detailed element of the proposed development comprises the highways infrastructure. The design of the highways has been the subject of extensive testing with the Council in relation to highways layout, junction design and future connections off site; in particular the likely connection to the Network Rail proposed roundabout at the junction of Ravensthorpe Road and Calder Road.

7.62 The proposed detailed highways layout has been designed to minimise engineering works (cut and fill) required to provide the spine roads through the Site whilst providing a development area that maximises the efficiency of the Site. The design evolution for the highways design is set out in full within the accompanying DAS.

7.63 The residential element of the proposed development is submitted in outline and seeks to establish the principle of development on the Site, with all matters reserved for future

approval. Detailed matters relating to layout, landscaping, appearance, scale and massing will be dealt with at the reserved matters stage.

7.64 The Design and Access Statement, submitted in support of the application, details the design rationale which has informed the proposed development. In terms of scale, the residential development will accommodate predominantly 2 – 2.5 storey housing. Variety in the heights and massing of the residential buildings can be achieved through the use of a range of house types and sizes, ranging from smaller 1 and 2 bedroom apartments, through to larger 4 and 5 bedroom detached dwellings.

7.65 In terms of appearance and layout the development will comprise a distinctive urban form including well defined perimeter blocks, with new family homes positioned to create attractive and legible residential streets, complemented by existing and proposed landscape features.

7.66 The DAS demonstrate that the illustrative masterplan has been designed to deliver a strong sense of place by following strong urban form principles across three different character areas. Frontages are emphasised along the Spine Road, Secondary Street and adjacent to open space and amenity areas. The Spine Road will comprise a continuous formal frontage, with regular intervals between built form, complemented by generous grass verges, accommodating proposed landscape and drainage features.

7.67 The Secondary Street frontage will comprise a predominately formal frontage, with some minor variations in the building line. Buildings enclosing the street will comprise a mix of detached, semidetached and terraced housing with variety of parking typologies. The Landscape Frontage will generally be characterised by an organic edge, comprising an informal building line with generous front gardens.

7.68 A sequence of raised junctions with changes in material to create variation in character, aid traffic calming, and assist with legible movement. Landmark/key buildings will be used to emphasise important views and spaces. These buildings are likely to include subtle changes in materiality and /or scale and massing.

7.69 The design of future reserved matters proposals will be informed by the recommendations of the Applicant's Climate Change Statement submitted in support this application.

7.70 The proposed development is, therefore, in line with local and national policy and guidance on design.

Landscape

7.71 Policy LP63 of the Local Plan sets out the Council's expectation for the provision of open space in new developments. The Open Space SPD also provides further guidance on this.

7.72 The landscaping strategy for the site confirms that a network of green infrastructure will be used to enhance the attractiveness and sense of place across the Site. The majority of existing features, including healthy trees and hedgerows, will be retained as part of the development.

7.73 The framework for the public open space and green infrastructure will set the scheme into the existing landscape, including a sympathetic and successful response to the landform. Central to the landscape strategy is the creation of a well landscaped and green development, through the provision of interconnected areas of public open space.

7.74 Opportunities exists to create a variety of green infrastructure typologies across the Site, including semi-natural open space, formal amenity space, wetland areas, street trees within grass verges, structural planting and residential streets lined with hedgerow planting. Areas of green infrastructure will be connected by landscape corridors that provide a network of pedestrian friendly attractive spaces.

7.75 Whilst the Site has been intensively farmed, the proposed development will also include the retention of existing landscape features (including trees and hedgerows). Retained landscape features will be reinforced and complemented by new planting, guided by a considered landscape design rationale and informed by the landscape character and visual characteristics of the Site and its context.

7.76 The key points of the landscape framework are:

- New homes will be positioned in response to the Site's rising topography, ensuring accessible streets that allow for views towards the surrounding area.
- A network of interconnected green spaces that enable pedestrian friendly routes.
- The proposed Spine Road/ bus route will be flanked by a grass verge, accommodating earth works, drainage features and new planting.

- A 'wetland park' on the low ground, accommodating SuDS, wetland planting and off-road pedestrian connection.
- Potential children play area, integrated with midrange SuDS.
- Residential streets that are softened with street trees.
- A network of green spaces/ corridors that link the central pocket park in the scheme through pedestrian friendly routes.
- Retain and enhance existing features, including healthy trees and hedgerows.
- Enhance the biodiversity and ecological value of the Site, through establishment of a network of species rich habitats.
- Utilise open space and green infrastructure to reduces the visual prominence of the overhead power cables.

7.77 Delivery of the proposed development in accordance with the above principles will ensure that the scheme is in accordance with local policy relating to landscape.

Ecology and Trees

7.78 Local Plan Policies LP30, LP31, LP32 and LP33 set out the Council's expectation for developers to sensitively design sites, having regard to the existing ecology and trees on the Site and in the immediately surrounding area.

7.79 An Ecology Assessment has been prepared in support of the Application and confirms that one minor significant residual effect of the development (further to mitigation) is considered likely from the proposed development in relation to the effect on breeding birds; specifically ground nesting farmland birds, namely skylark.

7.80 In addition to the landscape provisions outlined within this Statement, the proposed development will provide the following mitigation measures to further mitigate for construction impacts and provide additional enhancements in line National and Local Planning Policy:

• Production of a Construction Environmental Management Plan (CEMP) to ensure sensitive and timely removal of vegetation under an Ecological Clerk of Works as required.
• Provision of replacement nesting habitat for generalist bird species to replace lost nesting opportunities following vegetation removal.
• Installation of a variety of bat and bird boxes to be installed on at least 20% of the new units

• Incorporation of plant species which are native and/or of known benefit for pollinators and other invertebrates in combination with provision of habitat features to support resting/hibernating invertebrates will contribute to meeting the targets of the National Pollinator Strategy as well as deliver biodiversity net gain.

7.81 Notwithstanding some unavoidable harm being caused by the proposed development, the Proposed Development will deliver a significant amount of green infrastructure that, not only will deliver a net gain in biodiversity but will also improve connectivity across the landscape. The Ecological Assessment confirms that the Green Infrastructure strategy proposed with the development is in line with local planning policy and will meet the objectives set out in the Pennine Foothills Biodiversity Opportunity Zone, providing enhancements for a number of targeted species.

7.82 Accordingly, whilst it is acknowledged that the loss of intensively farmed arable land will result in a minor adverse effect on the ground nesting birds that utilise this habitat, it is considered that there will be a beneficial effect for other bird species, such as woodland specialists and those that have a close association with residential housing, school and including species of conservation concern such as swift, house sparrow and starling.

7.83 Notwithstanding that the area of woodland on the western extent of the Site will remain untouched and, therefore, unimpacted by the proposals. A Tree Survey has been prepared in support of the application to assess the impact of the proposed development on the existing trees on Site.

7.84 A key principle of the Site's green infrastructure strategy is to retain and protect existing trees whilst also facilitating effective development areas for housing development. Tree loss is limited to that which is strictly necessary, whilst also ensuring the condition and safety of all remaining trees would not be compromised by the development.

7.85 Retaining mature trees will ensure arboricultural biodiversity is retained, whilst new tree planting will ensure long-term amenity and landscape value. Measures to improve the arboricultural quality will include:

- New tree planting within areas of public open space and within the proposed development area, including along the Primary Street.
- Selective tree planting around retained trees and landscape features
- Replacement of removed and poor quality trees

7.86 Given the recommended mitigation measures proposed, the proposed development is in accordance with local policies which address ecology and trees within development sites.

Summary

7.87 A technical assessment of the proposed development has been undertaken and this demonstrates that the principle of the proposed development at the Site is acceptable.

7.88 There are no other material or technical considerations that would outweigh the benefits of granting planning permission for the proposed development.

8.0 CONCLUSIONS AND SUSTAINABILITY CONSIDERATIONS

8.1 This Planning Statement has been prepared in support of a hybrid planning application for residential development, including associated works to provide access, drainage and green infrastructure at Dewsbury Riverside, Central Gateway.

8.2 The purpose of the planning system is to contribute to the achievement of sustainable development. The objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

8.3 For this to be pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development. For decision-making, in accordance with paragraph 11 of the NPPF, this means:

"approving development proposals that accord with an up-to-date development plan without delay"

8.4 We have assessed the proposed development against relevant local and national policy and it has been clearly demonstrated that the development is in accordance with those policies (Section 7).

8.5 Overall, and given the Site's allocation for housing development, we have demonstrated that the principle of the proposed development is acceptable.

8.6 The proposed development will make a valuable and necessary contribution towards the Council's housing land supply and will support the Government's objective to significantly boost the supply of housing. The delivery of up to 350 dwellings, including affordable housing and community facilities constitutes a significant benefit that should be given significant weight in the determination of the Application.

8.7 Moreover, the proposed development will 'unlock' the wider development of Dewsbury Riverside and help deliver the largest housing allocation within the Development Plan both within the current plan period and beyond. Accordingly, the benefits of the scheme are far wider reaching than the benefits that will be immediately realised by the development.

8.8 The proposed development is expected to bring numerous and significant economic, social and environmental benefits to the Borough. These include:

Economic Benefits

- Supporting local employment opportunities through the construction phase of the development as well as the supply chain companies ensuring ongoing expenditure and employment linked to the housing development industry;
- Once complete, the occupiers of the dwellings will generate expenditure to support the shops and services in Ravensthorpe and Dewsbury and the wider surrounding area;
- The proposed development will provide a financial contribution towards improved local infrastructure including highways, education, play areas and green infrastructure; and,
- Increase in Council Tax income stream and additional New Homes Bonus Payment.

Social Benefits

- The provision of both market and affordable housing against the backdrop of a lack of housing delivery (as evidenced in the 2020 Housing Delivery Test Results);
- Provide a mix of homes that will help diversify the local housing offer and attract more working age skilled people to the area, helping to sustain the local labour supply for business in the area;
- The provision of public space as part of the development will help to improve opportunities for community cohesion and interaction and will encourage healthier lifestyles;
- The proposals make provision for pedestrian and cycle routes across the Site and to the surrounding area, encouraging residents to make short trips by alternative modes other than the private car;
- The proposals accommodate an area for new community facilities; and,
- The development will assist in the continued vibrancy and vitality of existing services and facilities within the local area.

Environmental Benefits

- Retention and enhancement of existing area of woodland, known as Lady Wood, located on the western extent of the Site;
- Extensive tree planting and soft landscaping across the Site will create new natural landscaped areas to encourage new wildlife habitats and create a pleasant environment in which to live;
- Delivery of a 10% Biodiversity Net Gain across the Site;
- Provision of Sustainable Urban Drainage Systems;
- Delivery of a scheme in accordance with the recommendations of a Climate Change Statement;
- The Site is sustainably located and the proposed development will provide safe pedestrian and cycle access, as well as designated cycle parking, to encourage future residents to travel by alternative modes other than the private car.

8.9 Furthermore, the technical reports submitted as part of the Application demonstrate that the proposed development fully complies with all other policies of the development plan. Subject to the mitigation measures outlines within this Statement and accompanying technical reports being taken into account, there are no adverse impacts which would outweigh the notable and multiple benefits of the development.

8.10 In applying the presumption in favour of sustainable development as directed by the NPPF, assessing the proposed development against the development plan and other material considerations, we consider that the development should be supported in line with the recommendations of the NPPF.

8.11 We, therefore, conclude that the proposed development comprises sustainable development that is in accordance with the development plan when read as a whole, as well as national guidance. The proposed development has significant and far reaching benefits for the Site and the wider area. In applying the presumption in favour of sustainable development, planning permission should be granted accordingly.

APPENDIX 1

Local Plan Extract – Policy HS61 – Dewsbury Riverside

Site HS60

Local Plan ID	HS60
Site address	Land to the north of Hall Lane, Thornhill, Dewsbury
Ownership	Council
Gross site area (Ha)	1.11
Net site area (Ha)	1.11
Constraints	• The provision of a pedestrian footway is required across the site frontage • Improvements to local highway links may be required • Site is close to listed buildings • Site is close to archaeological site
Allocation	Housing
Indicative capacity	38 dwellings
Reports required	• Contamination report (Phase 1) • Heritage Impact Assessment • Pre-determination archaeological assessment
Other site specific considerations	N/A

Site HS61

Local Plan ID	HS61
Site address	Land to the south of, Ravensthorpe Road / Lees Hall Road, Dewsbury
Ownership	Private / Part Council
Gross site area (Ha)	161.37
Net site area (Ha)	142.9 - Area of UK BAP Priority Habitat removed
Constraints	• Major impact on a priority junction. • Multiple access points required along with significant improvements to Sands Lane, the bridge over the railway line, Steanard Lane and its junction with A644 and the upgrade of bridge over River Calder • Third party land may be required for access • Additional mitigation on the wider highway network may be required • Public right of way crosses the site

	• Potentially contaminated land • Noise source near site - noise from rail and road and various industrial sources • Part of the site lies within a UK BAP priority habitat • Proximity to a Local Wildlife Site • Parts of the site are within the Wildlife Habitat Network • Part of the site is an area of archaeological interest • Mine entrances present • Site is affected by high pressure gas pipelines • Part/all of the site is within a High Risk Coal Referral Area
Allocation	Housing
Indicative capacity	1,869 dwellings during the Local Plan period with potential for a further 2,131 dwellings beyond the plan period.
Reports required	• Contamination report (Phase 1 and 2) • Transport Assessment • Travel Plan • Surface water drainage report • Flood Risk Assessment • Noise assessment • Air Quality Impact Assessment • Predetermination archaeological assessment • Health Impact Assessment Required • Coal Mining Risk Assessment
Other site specific considerations	• Replacement allotment provision of equivalent or better quantity and quality will be required in a suitable location as part of the development. • Landscape character assessment has been undertaken for this site which should be considered in the development masterplan. • Site requires a drainage masterplan • Early Years and Childcare provision will be required relating to this allocation. • The provision of one new 2 form entry primary school will be required during the plan period with further 2 form entry capacity required beyond the plan period. • The provision of secondary school places will be monitored and delivered to meet demand as new housing is delivered during and beyond the plan period. The masterplan will safeguard land for future secondary school provision beyond the plan period should the need arise. • Early Years and Childcare provision will be required relating to this allocation. • Recreational and biodiversity – new areas of public open space, green infrastructure and habitats required. • The site will play a key role in helping transform Dewsbury and Ravensthorpe. Proposals should indicate how the place shaping strengths, opportunities and challenges can be addressed through reference to policies in the Local Plan, the Dewsbury Strategic

	Framework and other regeneration and urban renaissance strategies and initiatives.
	• This site requires the provision of multiple access points and will need to be carefully phased to ensure it complies with other policies in the Local Plan regarding transport.
	• Proposals for this site should also contribute towards:
	  • Improved rail, road, pedestrian and cycle connections
	  • Improvements to Ravensthorpe Station and surrounding area
	  • Delivery of landscape and environmental enhancements
	  • Services and infrastructure
	  • Mirfield Promenade Strategic Green Infrastructure proposals (SGI2110)
	• Additional mitigation on the wider highway network will be required. Development of this site has the potential for a significant impact on the Strategic Road Network. Measures will be required to reduce and mitigate that impact. The transport assessment will need to demonstrate that any committed schemes are sufficient to deal with the additional demand generated by the site. Where committed schemes will not provide sufficient capacity or where Highways England does not have committed investment, development may need to contribute to additional schemes identified by Highways England and included in the Infrastructure Delivery Plan (IDP) or other appropriate schemes. If development is dependent upon construction of a committed scheme, then development will need to be phased to take place following scheme opening.
	• In accordance with LP13 (part a, paragraph 4) the creation of a new local centre commensurate with the scale of growth proposed will be supported, subject to the sequential test and impact assessment.
	• Proposals for this site will need to take account of TS5 Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone.
	• The council will monitor the implementation of the early phases of delivery to manage the options and need for strategic highways intervention in advance of the 2000th dwelling.
	• A landscape buffer along the southern boundary of the site is required.
	• A masterplan is required for this site to be prepared in accordance with policies in the Local Plan.