KIRKLEES METROPOLITAN COUNCIL
INVESTMENT & REGENERATION SERVICE

DEVELOPMENT MANAGEMENT

Town and Country Planning Act 1990 (as amended) – SECTION 70

DELEGATED DECISION TO DETERMINE PLANNING APPLICATIONS

Reference No:	**2022/62/93081/W**
Site Address:	adj, 1, Westbourne Road, Marsh, Huddersfield, HD1 4LA
Description:	Removal of existing BT phone box and installation of replacement BT street hub [within a Conservation Area]
Recommending Officer:	William Simcock

DECISION - REFUSED

I hereby authorise the refused of this application for the reasons set out in the officer's report and recommendation annexed below in respect of the above matter.

Teresa Harlow

AUTHORISED OFFICER

Date: 31 January 2023

Officer Report 2022/93081
Adj 1 Westbourne Road Marsh

Site Description

The site of the proposed application is land within the public footway outside the Junction public house, a two-storey building in stone and Westmorland slate with a large paved forecourt which is located on the southern side of Westbourne Road close to the junction with Gledholt Road. The nearest buildings on the opposite side of the road are a church and an ambulance station, but on the south side of the road, the neighbouring development is residential.

Description of Proposal

The proposal is for the removal of an existing BT phone box and the installation of a BT Street Hub.

The proposal is for the removal of an existing BT phone box and the installation of a BT Street Hub. A Street Hub is a facility that offers free encrypted Wi-fi, USB ports for device charging, free phone calls, a direct dial 999 button, and would also host two digital advertising screens. The applicant's supporting documents make the following statements in support:

- Speeds will be several times faster than that of typical fixed-line broadband.

- It is designed to provide access to local council services, British Telecom's phone book, local weather information, maps and wayfinding, and national charities, without allowing open web browsing.

- The speaker volume is automatically reduced at night, except for emergency calls.

- It is proposed that the sales team would work in partnership with small and medium-sized local enterprises to allow them to promote themselves via the digital display screens, which may be also used to host public awareness messaging or general advertising.

- Call-blocking technology would be used to minimise anti-social behaviour, with the possibility of taking further measures on police recommendations.

- The Hub would contain sensors to monitor air quality, noise and traffic.

The Street Hub would be a free-standing structure with an overall height of just under 3m, 1.24m wide and 350mm deep with a footprint of 0.42sqm. It would be constructed of galvanised mild steel, with a powder-coated external grade aluminium exterior, displays fronted by tempered and laminated glass.

Another feature is a video camera, which the applicant states will not, in the short term, be connected or used, but may be in the long-term after consultation with stakeholders and the public.

The proposed Hub would be placed 500mm from the edge of the carriageway.

The phone box that is proposed for removal is adjacent to the Shell petrol filling station a short distance to the west on the opposite side of the road.

The footway does not have a clearly-defined boundary at this point, but information from Kirklees maps (showing Kirklees land disposals and acquisitions and Land Registry information) indicates that it is 3.0m wide. Outside the filling station, it averages 2.75m.

History of negotiations/amendments received

None

Relevant Planning History

2022/93072 – Advertisement consent for two digital display screens. Awaiting determination

Representations
Final publicity date expires: 11-Nov-2022 (publicity by site notice and press advertisement in addition to neighbour letter on the grounds that the site is within a Conservation Area). One representation has been made, objecting to the proposal. Summary of concerns raised:

- The siting is inappropriate because the roundabout is already dangerous and this would offer a new distraction to drivers.

- The pavement is too narrow to accommodate it.

- Positioning it outside a pub is inappropriate.

- The footpath is proposed to become a shared path with cyclists and a new pedestrian / cycle crossing installed, none of which is compatible with a new street hub.

- Is there really enough footfall in this location to justify the BT Hub? It is more likely that this is a thinly-disguised method of getting consent for a digital advertising screen.

- If the planning application is for the removal of the old phone box, then a notice for this should have been displayed on that side of the road.

Consultation Responses

KC Police Architectural Liaison Officer – It is recommended that the Hub should not be placed here (in front of public house) because of the high risk of damage. The location of the existing phone box (on opposite side of Westbourne Road) would be preferable.

KC Town Centres Major Projects Team – Object on the grounds that it would create a distraction for drivers being located directly after a busy roundabout where carriageway width narrows and cyclists may be filtering into mixed traffic lane. It would block the sightline for drivers turning left and may create an increased risk for pedestrians.

KC Conservation & Design – Recommend refusal.

KC Highways Development Management were consulted but did not respond.

Policy

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for Kirklees is the Local Plan (adopted 27th February 2019) and the Holme Valley Neighbourhood Plan (adopted 8th December 2021)

Kirklees Local Plan

The site is within Greenhead Park / New North Road Conservation Area on the Local Plan Proposals Map.

Most relevant Policies:

LP 1: Presumption in favour of sustainable development
LP 19: Strategic transport infrastructure
LP 20: Sustainable transport
LP 21: Highways and access
LP 22: Parking
LP 24: Design
LP35: Heritage
LP 48: Community facilities

LP 52: Protection and improvement of environment quality

Supplementary Planning Documents:

- KC Highways Design Guide 2019

Other

- Biodiversity Net Gain Technical Advice Note
- Climate Change Guidance for Planning Applications

National Policies and Guidance:
National planning policy and guidance is set out in National Policy Statements, primarily the National Planning Policy Framework (NPPF) published 20th July 2021, the Planning Practice Guidance Suite (PPGS) first launched 6th March 2014 together with Circulars, Ministerial Statements and associated technical guidance.

The NPPF constitutes guidance for local planning authorities and is a material consideration in determining applications.

- Chapter 8 – Promoting healthy and safe communities
- Chapter 10 – Supporting high quality communications
- Chapter 12 – Requiring good design
- Chapter 15 – Conserving and enhancing the natural environment
- Chapter 16 – Conserving and enhancing the historic environment

Assessment
The following matters are considered in the assessment below –

1) Principle of development
1) Impact on visual amenity (including any heritage considerations)
2) Impact on residential amenity
3) Impact on highway safety
4) Other matters – e.g. trees/ecology (e.g. bats)
5) Representations
6) Conclusion

1 – Principle of development: There is no Local Plan policy that deals primarily with telecommunications infrastructure.

Chapter 10 of the NPPF, Supporting high quality communications, is applicable, which encourages a generally positive approach to new telecommunications proposals. Paragraph 114 states that “Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being”. Paragraphs 115-117 are mainly concerned with masts rather than ground-based facilities. Under paragraph however 118 “Local planning authorities must determine applications on planning grounds

only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure."

Other parts of the NPPF that are likely to be of relevance:

- Chapter 7 – Ensuring the vitality of town centres. Local Planning Authorities should take a positive approach to their growth, management and adaptation.
- Chapter 8 – Promoting healthy and safe communities. Crime, and fear of crime, should not be allowed to undermine quality of life and well-being.
- Chapter 12 – Requiring good design. Development must function well and add to the overall quality of an area.
- Chapter 16 – Conserving and Enhancing the Historic Environment

Policy LP24 sets out general principles for the assessment of all new built or operational development, in particular the following clauses are relevant:

"Development should promote good design by ensuring:

a. the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape;
e. the risk of crime is minimised by enhanced security, and the promotion of well-defined routes, overlooked streets and places, high levels of activity, and well-designed security features;
f. the needs of a range of different users are met, including disabled people, older people and families with small children to create accessible and inclusive places"

In particular, paragraph 11.8 of the Policy Justification states that broadband provision is an important consideration throughout the district and that "All telecommunications infrastructure should be capable of accommodating changes in technological requirements, without having a negative impact on the streetscene".

The following transport-related policies are deemed to be relevant:

LP19 – Proposals that may prejudice the future development of identified highway improvements, traffic management schemes or proposed public transport facilities, will not be permitted.
LP20 – Development should be designed to encourage sustainable modes of travel and place pedestrians at the top of the user hierarchy
LP20 – Development should ensure the safe and efficient flow of traffic.

The Street Hub and the existing call-boxes could both be considered a community facility or service, which under Policy LP48 should be provided in accessible locations and meet the needs of all members of the community. Removal of existing community facilities will only be permitted if it is no longer

required or that an alternative of equivalent or better quality will be provided. It is considered that the requirements of LP48 are met in this instance.

LP52 states that proposals that have the potential to increase pollution (including from noise) must demonstrate that the impacts have been evaluated and methods incorporated to prevent it having an adverse impact on quality of life and well-being of people and the environment.

Finally, section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that Local Planning Authorities shall pay special attention to the desirability of preserving or enhancing the appearance of buildings or land within a Conservation Area. In this context preservation means not harming the interests of the building as opposed to keeping it unchanged. Furthermore Chapter 16 of the NPPF states that in determining applications local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and that harm should not be permitted without a proportionate justification. This approach is also supported by Policy LP35 of the Local Plan.

2 –Impact on visual amenity: One of the functions of the proposed Street Hub would be to display illuminated advertisements, which in general would be assessed separately, under an application for consent to display an advertisement. In this instance, however, the display screens are an integral part of the development under consideration. The likely visual impact of the screens and any advertisements they are likely to carry must therefore be assessed as part of this application so that the proposal's impact on visual amenity can be fully appreciated.

The site is not within a town or local centre, nor is it within a location in which advertising is generally a prominent feature in the townscape. The character of Westbourne Road remains largely residential, at least on its southern side, from the site up to the boundary of Marsh Local Centre some 200m to the west.

The site is also within the Greenhead Park/ New North Road Conservation Area. The proposed site is directly in front of The Junction Inn, an Arts and Crafts building which makes a strongly positive contribution to the character of the Conservation Area, as does Gledholt Methodist Church, a Listed mid-19th century building on the opposite side of the roundabout.

It is considered that the proposed Street Hub would not be close enough to the Listed church to affect its setting, since it would not be seen in the same context, and has not been publicised as such. The proposed Street Hub would however detract from the architectural interest and character of the Junction Inn and, more generally, would increase street clutter in this location and would appear jarring and out of keeping with its surroundings, an effect that would be compounded by the digital images it would display.

The removal of the existing telephone box cannot be regarded as a compensatory measure because it is on the northern side of Westbourne Road, outside the Conservation Area boundary, and the Street Hub that would replace it would in any case be taller, wider, and more visually intrusive on account of its digital screens.

Paragraph 200 of the NPPF requires any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), to require clear and convincing justification. Paragraph 202 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. It is considered that the harm caused to the Conservation Area would in this instance be less than substantial.

Several public benefits are described in the application documents, including the provision of free phone and Wi-Fi access for the public, public awareness messaging and environmental monitoring. Whilst these may bring some benefits to the public they are not considered to outweigh the harm caused in this instance. Even if the applicant were to provide a clear and convincing justification why siting the proposed Street Hub within the Conservation Area is the only reasonably practical option (rather than, for example, on the northern side of Westbourne Road) it is doubtful that this would be deemed, on balance, to outweigh the harm caused to the Conservation Area by the large, intrusive advertisement screens.

The proposed development would therefore be contrary to the aims of Policy LP24(a), LP35, and Chapter 16 of the NPPF, and the Council's duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

3 – Impact on residential amenity: The submitted documents include a Noise Management Plan which proposes different volume settings for different times of day. Whilst there are residential properties in the vicinity of the site, the closest neighbouring buildings are not in residential use, and it is expected that at this location there would be significant traffic noise late into the evenings. It is therefore anticipated that any noise associated with the proposed Street Hub would not significantly affect residential amenity, thereby according with the aims of LP24(b) and LP52.

4 – Impact on highway safety: Kirklees Major Projects Team object to the proposal on account of:

i. Distraction;

i. Obstruction to visibility.

The proposed Street Hub would host digital illuminated advertisements which are, in general, assessed under the Advertisement Regulations, but in this instance are an integral part of the development under consideration and are essential to its viability, as set out in paragraph 2.2 of the Planning Supporting Statement. It would therefore be unreasonable to determine this application without regard to the impact of the proposed digital advertisements.

Planning Practice Guidance on advertisements (2014, amended 2019) is mainly intended as a guide to determining applications for consent to display an advertisement. Since the two criteria to be taken into account in the determination of advertisement consent applications – amenity and public safety – are also material considerations in assessing applications for planning permission, the PPG can be deemed relevant and any advice it contains, other than that relating to purely procedural matters, can be deemed relevant. The PPG lists the main types of advertisement which may cause danger to road users. The list includes, amongst other things, those which would because of their size or siting, obstruct or confuse a road-user's view, or reduce the clarity or effectiveness of a traffic sign or signal. In addition, it also refers to internally illuminated signs (incorporating either flashing or static lights), including those utilising LED technology, where the means of illumination is directly visible from any part of the road, and which are subject to frequent changes of display.

By their very nature all advertising signs are a distraction to drivers. The severity of the distraction, the number of drivers that can be distracted and the location of the site can impact on the level of severity of the outcome of any distractions. In this instance, the proposed Street Hub and its digital screens would be positioned approximately 22m west of the roundabout forming the junction of Trinity Street, Gledholt Road and Westbourne Road. For drivers approaching the roundabout from an easterly direction (i.e. from Trinity Street), or those already on the roundabout and heading towards the Westbourne Road or Edgerton Grove Road (northern) exit, it is considered that the potential for distraction (arising from advertisements displayed on the east-facing screen) is sufficient to be a cause for concern and could give rise to an increased risk of accidents, contrary to the aims of LP21.

The Major Projects Team has also raised as a concern the possible obstruction to the sight line for drivers turning left. In this direction, however, drivers would not be facing oncoming traffic, and by the time they had negotiated the roundabout they would have an unobstructed view of the road ahead. It is considered therefore that it would be difficult to substantiate this as a reason for refusal.

The Department for Transport document "Inclusive Mobility – A Guide to best Practice" dated December 2021 suggests that the width for a footway to allow two wheelchair users to pass would be 2m with an absolute minimum of 1.5m. A lower width of 1m can be accepted providing that the narrowing is no longer than 6m in length. However, in the case of higher-than-average pedestrian flows, such as those found in town centres and along certain desire lines, or

areas adjacent to shops and services where browsing or waiting may occur, then wider footway distances may be required.

As previously stated, the “official” width of the footway, based on maps held by the Council, is roughly 3.0m, and pedestrian flows, at the time of the case officer’s site visit, were modest. It should be noted that the useable width of the footway immediately west of the site is less than 3.0m because of the presence of a planter, which is shown on the applicant’s site layout plan. The Street Hub would leave a gap of 500mm before the carriageway boundary, and being just under 1.24m in width, this would imply approximately 1.26m of footway remaining on the opposite, or southern side. On occasions, the presence of a Hub user might make the width of the obstruction even greater. The localised narrowing of the footway to 1.26m or less next to a very busy road would certainly not be in the best interests of pedestrian safety or convenience. There is even a possibility that it might lead to pedestrians briefly straying on to the carriageway in order to negotiate the obstacle, at a point where motorists’ attention will already be preoccupied with the difficulty of negotiating the roundabout.

The removal of the existing call box cannot be regarded as a net benefit from the point of view of the useability of this stretch of footway because it is on the opposite side of the road to the application site. It is acknowledged, as mentioned in the applicant’s supporting statement, that the Street Hub would have a smaller footprint than the call-box, the more relevant consideration in assessing any impact it would have on pedestrian safety and convenience is its width. The width of the proposed Hub is greater than that of the existing call-box.

Whilst obstruction to the public footway was not raised as a concern by Major Projects in this instance, it is considered that the creation of an additional obstacle to the footway at this point would give rise to an increased risk of road traffic accidents, contrary to the aims of LP21, and impede the passage of pedestrians, including, but not restricted to, wheelchair users and people with vision impairment, and as such would conflict with the aim of facilitating the needs of the user hierarchy and accessibility as set out in Policy LP20 and LP24(f).

5 – Other matters:

Supporting high quality communications:
Chapter 10 of the NPPF, as previously stated, encourages a positive approach to new telecommunication development and requires that Local planning authorities must determine applications on planning grounds only. This approach has been followed here. Whilst it is acknowledged there may be public benefits in the development, it is considered that these are in this instance not sufficient to outweigh the highway safety and other planning concerns set out above.

The applicant has submitted an ICNIRP certificate of conformity. This is the

appropriate health safeguard in respect of planning considerations and is as set out in Chapter 10 of the NPPF.

Public realm improvements:
The WY Combined Authority scheme for improved walking and cycling provision between Huddersfield and Halifax would pass through this area:

https://www.yourvoice.westyorks-ca.gov.uk/a629-halifax-hudds

If this scheme were implemented, the footway outside the Junction Inn would become a shared footway / cycleway. Clearly, any new obstacles in the footway would make it impossible to fully implement this scheme, or would at least render it less effective and less safe for users. The proposed Street Hub would therefore be contrary to the aims of LP19 (TS4 Huddersfield to Halifax corridor) in that it would prejudice the future development of identified highway improvements and cycling infrastructure, and would be contrary to the wider aims of promoting sustainable transport and facilitating the needs of the user hierarchy as set out in Policy LP20.

Crime and disorder:
The applicant has submitted an Anti-Social Behaviour Statement which states that they will encourage feedback from the Police and local stakeholders, and sets out possible measures designed to limit the chances of crime or anti-social behaviour occurring, including blocking calls to specific numbers (only when agreed with the police, in addition to those captured under automatic anti-social call restriction) and disabling the USB port to discourage loitering. Furthermore, each Street Hub will be remotely monitored for service compliance 24 hours a day and will be physically inspected and cleaned at least every two weeks.

The measures set out in the Anti-Social Behaviour Statement, it is expected, would prevent or severely limit criminal misuse (such as the Street Hub being used to conduct drug deals), but they might be less effective at preventing vandalism. The Police Architectural Liaison Officer has objected to the proposal, on the grounds of the close proximity to the Junction Inn.

Street Hubs, or any other items of new street furniture, may become targets for vandalism. Establishments serving alcohol may be a focus for anti-social behaviour, including acts of criminal damage, by customers on, or leaving, the premises. This is more likely to occur where there is a high concentration of such establishments or other evening-economy uses, or in other locations where there is a significant known problem of anti-social behaviour. It is considered that whilst there is a possibility of vandalism occurring, it is considered that in the absence of evidence of existing problems of this nature, evidence for a wider pattern of acts of criminal damage to street furniture occurring in similar settings, it might be difficult to substantiate this as a reason to refuse under LP24(e), as being disproportionate to the risk.

Biodiversity:

The site is in an urban area lacking significant green infrastructure. It is considered that the proposed development has no biodiversity implications and there would be little, if any, opportunity for ecological enhancement, if officers were minded approving.

Drainage and flood risk:
The site is not in an area known to be at risk of flooding and the proposal does not create additional hardstanding. It is therefore considered to have no drainage implications.

Climate Change:
On 12th November 2019, the Council adopted a target for achieving 'net zero' carbon emissions by 2038, with an accompanying carbon budget set by the Tyndall Centre for Climate Change Research. National Planning Policy includes a requirement to promote carbon reduction and enhance resilience to climate change through the planning system and these principles have been incorporated into the formulation of Local Plan policies. The Local Plan pre-dates the declaration of a climate emergency and the net zero carbon target; however it includes a series of policies which are used to assess the suitability of planning applications in the context of climate change. When determining planning applications the Council will use the relevant Local Plan policies and guidance documents to embed the climate change agenda.

According to the applicant's supporting statement, the Street Hub would be powered by 100% renewable energy. Further details of this could be sought if officers were minded to approve. The proposal is in principle deemed to be in accordance with the aims set out above, and set out in NPPF Chapter 14 and Policy LP26 of the Local Plan.

6 – Representations: One representation was made. Highway safety concerns have been evaluated earlier in this assessment but are highlighted here with other issues raised and officer responses:

- The siting is inappropriate because the roundabout is already dangerous and this would offer a new distraction to drivers.

Response: This concern is considered to be substantiated.

- The pavement is too narrow to accommodate it.

Response: This concern is considered to be substantiated – see section 4 of the Assessment above.

- Positioning it outside a pub is inappropriate.

Response: This is an understandable concern but it is considered on balance that the heightened risk of vandalism would be difficult to substantiate as a reason for refusal without further evidence.

- The footpath is proposed to become a shared path with cyclists and a new pedestrian / cycle crossing installed, none of which is compatible with a new street hub.

Response: This is considered to a be legitimate concern. The Street Hub would not be compatible with the proposed improvements and would therefore conflict with Policies LP19-20..

- Is there really enough footfall in this location to justify the BT Hub? It is more likely that this is a thinly-disguised method of getting consent for a digital advertising screen.

Response: As previously stated, the claimed benefits of the Street Hub are not considered to outweigh the harm caused (including to the character of the Conservation Area). But speculation about the applicant's motives in applying cannot be treated as a material consideration.

- If the planning application is for the removal of the old phone box, then a notice for this should have been displayed on that side of the road.

Response: Under the Development Management Procedure Order, the requirement is only that a notice be displayed "in the vicinity of the application site". It is considered that the Council has fulfilled its duties regarding publicity.

7 – Conclusion: The NPPF has introduced a presumption in favour of sustainable development. The policies set out in the NPPF taken as a whole constitute the Government's view of what sustainable development means in practice.

This application has been assessed against relevant policies in the development plan and other material considerations. It is considered that the development would constitute sustainable development and is therefore recommended for approval.

Recommendation **Refusal**

Decision Authorisation - Delegated Powers

Application Number: **2022/93081**

Officer Recommendation: Refusal

Reasons for refusal

1. The site lies within the Greenhead Park/ New North Road Conservation Area whereby the proposed Street Hub and the digital display screens it supports on both principal elevations would appear jarring and out of keeping with their surroundings. In particular it would detract from the setting of the Arts and Crafts designed Junction Inn and result in harm to visual character and appearance of the wider Conservation Area and street scape. Whilst the harm caused would be less than substantial, it is considered that the public benefits associated with the proposed development, as set out in the supporting documents, are not, in this instance, sufficient to outweigh the harm caused. The proposed development would therefore be contrary to the aims of Policy LP24(a) and LP35 of the Kirklees Local Plan, Chapters 12 and 16 of the National Planning Policy Framework, and the Council's duty under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1. The proposed Street Hub would include illuminated screens on both principal elevations. These are an integral part of the development under consideration, as set out in paragraph 2.2 of the Planning Supporting Statement. The proposed illuminated screens, by virtue of their siting close to a heavily-used traffic roundabout, their illumination, and the rotation of images displayed, would give rise to an unacceptable degree of distraction to motorists, to the detriment of the safe use of the highway, contrary to the aims of Policy LP21 of the Kirklees Local Plan.

2. The proposed Street Hub would reduce the available width of the footway to significantly less than 2m, which is the recommended minimum set out in the Department for Transport document "Inclusive Mobility – A Guide to best Practice" (December 2021), and when being used for charging or call access this could be reduced even further by the presence of a user. This would not be in the best interests of pedestrian safety and convenience, especially for wheelchair users and for mobility-impaired or vision-impaired pedestrians. The proposed Street Hub would therefore conflict with the aim of facilitating the needs of the user hierarchy and accessibility as set out in Policy LP20 and LP24(f) of the Kirklees Local Plan and would be harmful to the safe and convenient use of the highway, contrary to the aims of Policy LP21. Furthermore, it would not result in a development that would function

well or add to the overall quality of the area as required by paragraph 130(a) of the National Planning Policy Framework.

3. The footway outside the Junction Inn, including the application site, is designated for upgrade to a shared footway / cycleway under a regional transport scheme for improved walking and cycling provision between Huddersfield and Halifax. The proposed Street Hub would thereby prejudice the future development of identified highway improvements and cycling infrastructure, and would not support the wider aims of promoting sustainable transport and facilitating the needs of the user hierarchy as set out in Policies LP19 and LP20 of the Kirklees Local Plan.

Plans and specifications schedule:-

Plan Type	Reference	Version	Date Received
Application form			16-Sep-2022
Location plan, site layout as proposed	HUD-208	A	16-Sep-2022
Existing and proposed site plan	HUD-208		06-Oct-2022
Dimensioned elevations			16-Sep-2022
Covering letter	HUD-208		16-Sep-2022
Developer's Notice (highways)	HUD-208		22-Sep-2022
ICNIRP Declaration of Conformity	HUD-208		16-Sep-2022
Noise Management Plan			16-Sep-2022
Product Statement			16-Sep-2022
Brochure			16-Sep-2022
Photomontage as proposed	HUD-208		16-Sep-2022
Supporting planning statement			16-Sep-2022
Anti-social behaviour statement		2	16-Sep-2022
FAQ			16-Sep-2022
ILP Professional Lighting Guide			16-Sep-2022

Pursuant to article 35 (2) of the Town and Country Planning (Development Management Procedure) Order 2015 and guidance in the National Planning

Policy Framework, the Local Planning Authority have, where possible, made a pre-application advice service available, complied with the Kirklees Development Management Charter 2015 and otherwise actively engaged with the applicant in dealing with the application. The case officer did not request amended or additional plans since the planning concerns related to the principle of the development rather than details.

Report Dated: 27-Jan-2023