

**Consultation Response from Emma Mills  
 KC Landscape**

<b>Application No:</b>	2023/90531
<b>Proposed Development:</b>	Demolition of existing warehouse building and erection of mixed-use retail warehouse (Use Class B8), showroom (Ea) and office (B2)
<b>Location:</b>	Highgate Beds Ltd, Bretton Street, Savile Town, Dewsbury, WF12 9DB
<b>Applicant/Agent:</b>	PARKdesigned Architects
<b>Planning Officer</b>	RichardA Gilbert
<b>Date Responded:</b>	20 <sup>th</sup> June 2022
<b>Responding Officer:</b>	AR
<b>Responding Ref:</b>	MM32

**NOTES/COMMENTS:** These comments are Without Prejudice

- Our comments take into consideration previous comments made in our response of May 2022 alongside the documents of application 2022/90189. We have also reviewed the most recent documents, as listed:
- Dwg No 21.33 - 005C: Proposed Elevations.  
 Dwg No 21.33 - 007A: Proposed Roof Plan  
 Dwg No 21.33 - 003 rev H: Proposed Site Plan.  
 Dwg No 21.33 - 005C: Proposed Elevations  
 Design and Access Statement  
 Plan General - P21-01381-MET-INT-G-FP-M2-B-001-1  
 Ground floor Proposed Floor Plans - 21.33\_001J  
 Proposed Ground & First Floors Proposed Floor Plans - 21.33\_002G  
 Second & Third Floors Proposed Site / Block Layout 21.33\_003J  
 Proposed Elevations - P21-01381-MET-EXT-XX-ELE-M2-B-002-1  
 Building 2 Plan General - P21-01381-MET-EXT-XX-TOP-M2-G-001-1  
 Topographical Survey Plan General - SUEN-AWP-ZZ-XX-DR-C-3000\_P1  
 Proposed Drainage Strategy  
 Existing Site / Block Layout - 21.33\_004B  
 Location Plan - 21.33\_006A
- The adjustments to the proposed landscape layout are appreciated, particularly the addition of native hedge, indicated as running parallel to Bretfield Court road. However, the provision is tokenistic, we do not consider this a significant or robust green boundary. Until recently there has been a thriving green margin to this site providing a strong visual green screen and a valuable wildlife bridge/resource. The impact of the proposed structure will be significant, and the loss of this green has a distinctly negative impact on an area already lacking in vegetation. This impact can be greatly reduced by moving the mass (structure) further back from the road allowing for a wider margin of green structure to be incorporated into the scheme. This would enhance both the street scene and soften the mass of the façade whilst adding/retaining a valuable and effective wildlife corridor within the site in replacement of the green structure recently removed. We would propose further tree planting in combination with the proposed native hedge.

4. Please also be reminded of the council's advice regarding Green Streets principles, as well as paragraph 131 of the NPPF, which requires new streets to be tree-lined.
5. *"Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined\*\*, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users."*  
*\*\* Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate*
6. The planting scheme to Bretton Street is also much improved and we welcome the additional trees.  
The planting schedule is not comprehensive so we are therefore not able to comment on the planting at this time and will require a full planting schedule.
7. Tree planting and other screening planting could additionally help the proposed development comply with policies and guidance regarding design, biodiversity, health and wellbeing and other relevant planning considerations.
8. Landscape proposals, particularly frontline tree planting and planting to open spaces, should identify all proposed root protection/barriers, drainage, suds and attenuation or soakaways and all easements to ensure trees are accommodated satisfactorily.
9. Additionally, we would anticipate all new tree planting within 5m of the adoptable highway to include adequate root barrier, clearly identified on the proposed landscape plans.
10. Details should be submitted for proposed tree planting in front gardens and highways verges demonstrating adequate soil volumes and tree pit details to support the growth of the tree for the long term, such as: the volume of tree pits, details of soil volume & root management, details of installation, timing/planting season and long term management.
11. In addition, please note that we consider Para 135- which states Local planning authorities should seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).
12. Species selection is important and those which are potentially more invasive should be substituted for less potentially invasive species.

13. Preference is for native and proven beneficial to pollinators where possible for this location.
14. We will need to see a management plan for the landscaping scheme to ensure the scheme successfully establishes. The management of newly establishing trees should include, but is not limited to, a watering regime, monitoring of stakes and ties, formative pruning, replacement of failed or damaged trees.
15. Can we also request that the current Dwgs in particular the GA is updated to show the current landscape layout, the current set of dwgs do not fully align.

With regards our comments on the information provided in the application, these are without prejudice and are not to be read as approval on the principle of development.

### **Advice to planning officer:**

To be satisfied with the proposals we will need to see amendments to the layout and protection measures, a working methodology for the site along with a 5yr maintenance plan.

**Once the above information is received, KC Landscape should be consulted once again, and appropriate conditions can be brought forward.**

**The information below is intended for the applicant to consider and include in any amendments of support the application in order to help provide sufficient landscape and open space information to aid the planning process:**

1. Full landscape proposals are required as a planning condition including hard and soft landscape details and planting plans to create a diverse and attractive landscape which should enhance the setting of the development. Thoughtful planting to incorporate native species would contribute to enhancing the biodiversity in this setting and would help in the development of green corridors as well as providing valuable mitigation for existing local residents or those in the vicinity who will be overlooking this development should permission be granted. All details relating to existing retained trees and vegetation should also be provided, including their protection during the development.
  - Conditions will be included to secure detailed landscape plan and long-term management. For developments where detailed landscape design has not yet been agreed and the design needs to fulfil a requirement for ecological mitigation and/or enhancement tree planting.
  - No development shall take place until a landscape and ecological design (LEDS) has been submitted to and approved in writing by the local planning authority.
  - We will require full detailed landscape plans indicating full planting specification, including:
    - Layout, species, number, density and size of trees and plants and/or seed mixes and sowing rates, including extensive use of native species. Any phasing of the works
    - Details of all hard landscape materials and boundary treatments, garden fences/walls etc. Proposed treatment to existing boundaries.
    - Timetable for implementation demonstrating that works are aligned with the proposed phasing of development.
    - Persons responsible for implementing the works.
    - Landscape Management Plan required including details of initial aftercare and long-term maintenance for minimum of 5 years. This should also include any existing trees and vegetation retained on site, plus management of any equipment or playable space, including safety inspections.

- Details for monitoring and remedial measures, including replacement of any trees, shrubs or hedge that fails or becomes diseased within the first five years from completion.
  - The LEDS shall be implemented in accordance with the approved details and all features shall be retained in that manner thereafter.
2. The Council considers a presumption in favour of tree planting in verges and adjacent to carriageways in line with the West Yorkshire Combined Authority 'Green Streets ®' principles, unless there are valid reasons for their omission. Refer to the Highways Design guide: [Highway Design Guide Supplementary Planning Document \(SPD\) \(kirklees.gov.uk\)](#). Tree planting is very important and getting the right types and size of trees in the right places is imperative. Trees should be incorporated in the scheme for a variety of reasons: to a) visually break up the built form b) help to screen/ mitigate or frame certain views c) support biodiversity and create green corridors/green links, d) not to create a nuisance in peoples gardens through leaves in gutters or screen the sun etc. e) not to cause damage to property boundaries/garden fences/dry stone walls in the future, or damage any SuDS system. There are opportunities for tree planting within the site and this will help mitigate the scheme. That being said, careful design is required. Trees should be incorporated into the street where possible but when necessary, in gardens, not being located too close to buildings.
  3. The scheme should consider how trees and street lighting should be specified together to avoid tree canopies from obstructing large amounts of street lighting and provision of a maintenance schedule for trees to ensure safe levels of lighting at street level once trees mature.
  4. Policy LP24 of the Kirklees Local Plan advises that good design should be at the core of all proposals in the district. This reflects guidance within the National Design Guide and the National Planning Policy Framework, at Paragraph 126, which confirms that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
  5. Policy LP31 – Strategic Green Infrastructure Network states that priority will be given to safeguarding and enhancing green infrastructure networks, green infrastructure assets and the range of functions they provide. Development proposals within and adjacent to Strategic Green Infrastructure Networks should ensure: -
    - a. The function and connectivity of green infrastructure networks and assets are retained or replaced.
    - b. New or enhanced green infrastructure is designed and integrated into the development scheme where appropriate, including natural greenspace, woodland, and street trees.
    - c. The scheme integrates into existing and proposed cycling, bridleway and walking routes, particularly the Core Walking and Cycling network, by providing new connecting links where opportunities exist.
    - d. The protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network