

Planning Statement

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West Yorkshire Combined Authority

Dewsbury Bus Station



Planning Statement

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Project manager: Mike Kettlewell

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Prepared by: Michelle Smith

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Jacobs U.K. Limited

7th Floor, 2 Colmore Square
38 Colmore Circus, Queensway
Birmingham, B4 6BN
United Kingdom

T +44 (0)121 237 4000
www.jacobs.com

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Contents

1.	Introduction.....	1
1.1	Background.....	1
1.1.1	Pre-application Advice and Environmental Impact Assessment Screening Opinion.....	2
1.2	Content of this Document.....	2
1.3	Supporting Information	2
2.	Site Location and Context.....	4
2.1	Location.....	4
2.2	Existing Site	4
2.2.1	Existing Bus Station Building.....	4
2.2.2	Existing External Layout and Access	5
2.3	Surrounding Area	5
2.4	Public Rights of Way and Cycle Routes.....	5
2.5	Heritage.....	6
3.	The Scheme	8
3.1	Introduction.....	8
3.2	Bus Station Building	9
3.3	Access and Parking	9
3.3.1	Pedestrian Access	9
3.3.2	Cycle Access and Parking.....	10
3.3.3	Bus Access and Parking	10
3.3.4	Service and Maintenance Vehicles.....	10
3.3.5	Taxis.....	10
3.4	Bin Store	11
3.5	Lighting Strategy	11
3.5.1	External Lighting	11
3.5.2	Internal / Building Lighting.....	12
3.6	Landscaping	12
3.6.1	Soft Landscaping Proposals.....	13
3.6.2	Hard Landscaping Proposals	14
3.7	Construction Phase.....	14
4.	Environmental Considerations.....	15
4.1	Flood Risk Assessment.....	15
4.2	Surface and Foul Water Drainage Strategy	15
4.2.1	Surface Water Drainage.....	15
4.2.2	Sustainable Urban Drainage System	16
4.2.3	Foul Water Drainage	16
4.3	Heritage Statement	16
4.3.1	Listed Buildings.....	16
4.3.2	Registered Parks and Gardens	17
4.3.3	Scheduled Monuments.....	17

4.3.4	Conservation Area.....	17
4.3.5	Buried Remains.....	17
4.3.6	Assessment.....	17
4.4	Ecological Assessment.....	18
4.4.1	European and Nationally Designated Sites	18
4.4.2	Ancient Woodland	18
4.4.3	Local Wildlife Sites.....	18
4.4.4	Protected or Notable Species.....	18
4.4.5	Priority Habitats.....	18
4.4.6	Invasive Non-Native Species.....	19
4.4.7	Ecological Constraints Assessment.....	19
4.5	Bat Roost Assessment	19
4.6	Arboricultural Assessment Report.....	20
4.7	Biodiversity Net Gain Report.....	21
4.8	Transport Statement.....	21
4.9	Stage 1 Road Safety Audit.....	22
4.10	Contaminated Land, Coal Mining, and Minerals	22
4.10.1	Coal Mining	23
5.	Climate Change Considerations	24
5.1	Introduction.....	24
5.2	Overview of the Proposals for Reducing Carbon	24
5.3	Climate Change Statement.....	25
6.	Planning Policy Review	26
6.1	Introduction.....	26
6.2	National Planning Policy Framework	26
6.2.1	Chapter 2: Achieving sustainable development	26
6.2.2	Chapter 4: Decision-making	26
6.2.3	Chapter 6: Building a strong, competitive economy.....	26
6.2.4	Chapter 7: Ensuring the vitality of town centres.....	27
6.2.5	Chapter 8: Promoting healthy and safe communities.....	27
6.2.6	Chapter 9: Promoting sustainable transport.....	28
6.2.7	Chapter 11: Making effective use of land.....	28
6.2.8	Chapter 12: Achieving well-designed places.....	28
6.2.9	Chapter 14: Meeting the challenge of climate change, flooding and coastal change	29
6.2.10	Chapter 15: Conserving and enhancing the natural environment.....	29
6.2.11	Chapter 16: Conserving and enhancing the historic environment	30
6.3	Local Planning Policy.....	30
6.3.1	Kirklees Local Plan.....	30
6.4	Other Material Considerations	36
6.4.1	National Planning Practice Guidance.....	36
6.4.2	Dewsbury Blueprint	39
6.4.3	Dewsbury town centre, Strategic Development Framework 2018 & Delivery Programme.....	39

6.4.4	Kirklees Highway Design Guide	39
6.4.5	Biodiversity Net Gain Technical Advice Note	39
7.	Conclusions.....	41

Appendices

Appendix A.	Kirklees Council's Pre-application Advice	47
Appendix B.	List of Drawings	61
Appendix C.	Planning and Environmental Consenting Strategy	64
Appendix D.	Climate Change Statement.....	123

1. Introduction

Jacobs UK Ltd has been commissioned by West Yorkshire Combined Authority (WYCA) (the Applicant) to prepare a planning application for the proposed transformation of the existing Dewsbury Bus Station, located on Aldams Road, Dewsbury, Kirklees.

WYCA, in partnership with Kirklees Council, are delivering a £13.9 million project to transform Dewsbury Bus Station. The plan includes an improved interior design, better accessibility for all bus station users and upgraded public entrances and exits (hereafter 'the Scheme').

Dewsbury Bus Station is a key transport hub and enables both local travel in the town and long-distance travel from the wider region. The plans to transform the bus station aim to:

- Encourage more people to visit Dewsbury Bus Station
- Transform passenger facilities
- Improve access and safety for all bus station passengers
- Attract new retail business and improve people's experience
- Help regenerate Dewsbury town centre in line with the Dewsbury Blueprint
- Make the bus station more energy efficient and reduce carbon emissions

The Scheme forms part of a programme of works in the Leeds City Region (LCR) funded by the Transforming Cities Fund (TCF), to make public journeys along the A638 from the Chain Bar roundabout at Cleckheaton and across to Dewsbury safer and more reliable. This would be achieved by increasing the number of buses and easing congestion along the A638 and by improving cycle routes and pedestrian crossings.

1.1 Background

The TCF comprises a £317m programme of investment that aims to deliver a transformational programme of new infrastructure and help create a step change in travel across the LCR. WYCA, on behalf of the LCR, submitted a Strategic Outline Business Case (SOBC) funding bid to the Department for Transport (DfT) under the TCF programme in November 2019. The SOBC detailed the development of 22 packages of schemes across the city region, identified to achieve the LCR TCF vision and programme objectives as outlined below.

WYCA's TCF Vision is *"to support delivery of inclusive growth across the Leeds City Region, through an innovative and coordinated walking, cycling and bus package, which provides genuine sustainable and healthy travel options for our communities along our corridors of greatest economic need, and transforms accessibility from new development sites and accommodates growth at key public transport hubs"*.

The vision has shaped the TCF objectives, which are:

- Enabling inclusive growth – *"To enable as many people as possible to contribute to and benefit from economic growth, and contribute to improved health and wellbeing of our residents"*;
- Boosting productivity – *"Working with businesses and universities to close the productivity gap, create thousands of jobs and add substantially to our economy"*;
- Supporting clean growth – *"Achieving our target for a net zero carbon economy by 2038 through lowering carbon emissions and taking advantage of new innovations to create jobs and growth"*; and
- Delivering 21st century transport – *"Creating a transport system which addresses the challenges we face around capacity, connectivity, sustainability and air quality"*.

Within Dewsbury, TCF funding will be used to improve access across the town centre. There will be improvements to the walking and cycling routes within the town, as well as better access to the rail and bus stations. These changes will contribute to LCR's goal of being a carbon neutral economy by 2038.

The Scheme is part of these improvements and will be funded under the TCF. It will seek to contribute to the TCF vision and objectives, in terms of better connecting people through affordable and sustainable transport measures. The Scheme aims to improve access to the bus station and refurbish the internal building to a higher standard, as well as offer opportunities to improve energy efficiency on site.

The Scheme will contribute to the wider ambitions for Dewsbury as a town, enabling the town centre to strengthen and sustain its economic role within the region, contributing to the delivery of the LCR's vision for 'good growth'.

1.1.1 Pre-application Advice and Environmental Impact Assessment Screening Opinion

A request for pre-application advice along with a request for a screening opinion under the Town and Country Planning (Environmental Impact Assessment (EIA)) Regulations 2017 was submitted to Kirklees Council on 3 October 2022. A response was received from Kirklees Council on 19 January 2023 (see Appendix A), which advised that an Environmental Statement is not required, and the principle of development would be considered acceptable under the adopted Development Plan and national planning policy. The response also identified the information required for the planning application; however, recommendations were made for the Applicant to liaise with individual internal and external consultees to determine the scope of various reports and assessments prior to the submission of a planning application.

1.2 Content of this Document

This Planning Statement contains the following information:

- **Chapter 2: Site Location and Context** - describes the application site and the surrounding area
- **Chapter 3: The Scheme** – provides an overview of the Scheme and description of different elements of the Scheme, as well as details for the construction phase
- **Chapter 4: Environmental Considerations** - provides an overview of the technical reports submitted with the planning application, as well as a Surface and Foul Water Drainage Strategy, and a Heritage Statement
- **Chapter 5: Climate Change Considerations** - provides details about how the Scheme has been designed to reduce and minimise energy consumption, and its approach to sustainable development, and an overview of the Climate Change Statement
- **Chapter 6: Planning Policy Review** - assesses the proposals against pertinent planning policies at a local and national level
- **Chapter 7: Conclusions** - provides a summary of the Scheme and key findings from this document
- **Appendix A: Kirklees Council's Pre-application Advice**
- **Appendix B: List of Drawings**
- **Appendix C: Planning and Environmental Consenting Strategy**
- **Appendix D: Climate Change Statement**

1.3 Supporting Information

The planning application is accompanied by a suite of supporting information in addition to this document as detailed below:

- Completed application forms, notices and certificates

Planning Statement

- Site location plan, block plan and other relevant drawings (see Appendix B)
- Design and Access Statement (DAS), including a Crime Prevention Statement
- Flood Risk Assessment (FRA)
- Ecological Constraints Assessment and Preliminary Bat Roosting Assessment
- Arboricultural Assessment Report (AAR), containing an Arboricultural Impact Assessment (AIA) and an Arboricultural Method Statement (AMS)
- Biodiversity Net Gain Report
- Desk Study and Coal Mining Risk Assessment
- Transport Statement (TS)
- Stage 1 Road Safety Audit (RSA)
- Construction Traffic Management Plan (CTMP)

2. Site Location and Context

2.1 Location

Dewsbury is a town located in the northeast of Kirklees district in West Yorkshire. It is approximately 14km south of Leeds, 11km northeast of Huddersfield and 9km west of Wakefield. The town centre is surrounded by Dewsbury Ring Road (the A638), with Aldams Road at the south of the Ring Road and the A638 making up the rest of the Ring Road at the north, east and west. Dewsbury Bus Station is situated close to the town centre employment area and retail core situated to the northeast. Dewsbury train station is located approximately 250m to the north of the site. **Figure 1** shows the location of the existing Dewsbury Bus Station.

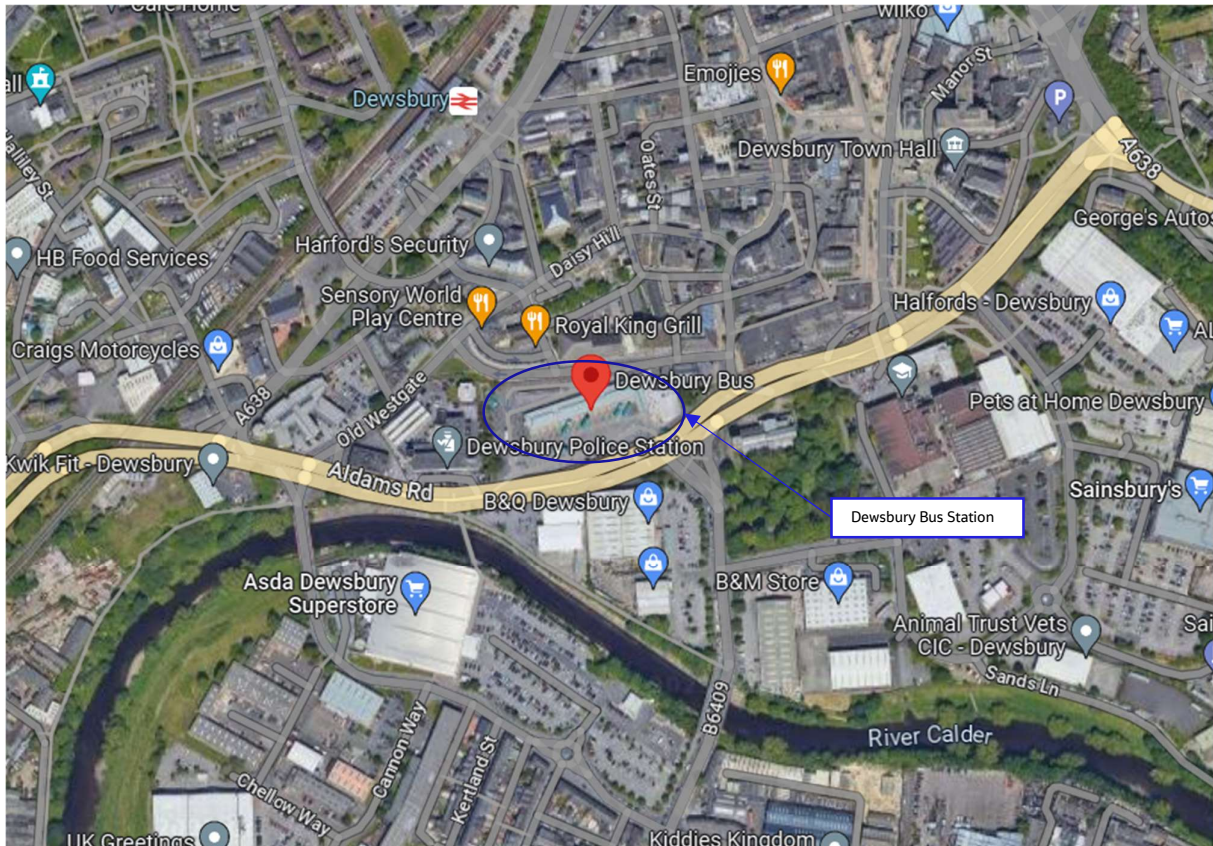


Figure 1: Site location (source: Google Maps 2023)

2.2 Existing Site

The application site comprises the existing Dewsbury Bus Station. The red line boundary for the site comprises an area of 10,534m².

Details for the existing bus station building, and external layout and access are below.

2.2.1 Existing Bus Station Building

The existing bus station building was completed in 1994 and generally comprises of curtain wall glazing for the concourse with a brick plinth externally and a tiled masonry plinth internally.

The existing bus station facility currently consists of a single level bus station building, which currently comprises a passenger concourse and mall, five retail units, and staff/public facilities, comprising of:

- Bus station manager office

- Customer care office
- Bus operator inspector's office (disused)
- Combined cleaner's store and staff rest room
- Cleaning machine store
- ATM room
- Travel centre and associated toilet and storeroom (disused)
- Public toilets, including an accessible toilet
- Plant room

2.2.2 Existing External Layout and Access

The existing bus station consists of the following vehicle provision:

- 15 Drive in Reverse Out (DIRO) bus stands
- One shallow sawtooth bus stand
- Two drop-off bus stands
- Two separate external coach stands (disused)
- Four bus layover bays
- One ambulance bay
- One service bay for transit van sized service vehicles
- 12 – 14 staff/contractor car parking spaces
- A single Electric Vehicle (EV) parking space is provided for use by authorised maintenance/staff vehicles.

There is access to the bus station for pedestrians and authorised vehicles from Aldams Road and South Street. No public car parking is provided on the site.

2.3 Surrounding Area

The surrounding area is predominantly characterised by retail uses. To the north of the site, beyond South Street, are retail units, restaurants and takeaways. To the south, beyond Aldams Road are large retail units, including Farmfoods, B&Q and Screwfix, as well as Dewsbury Minster (a Grade II* listed building). The River Calder is also located to the south of the site, directly to the south of the large retail units. To the west of the site is the Dewsbury Police Station and to the east is a private car parking area and retail units which front South Street. Further to the east, beyond Church Street is the Princess of Wales shopping centre.

2.4 Public Rights of Way and Cycle Routes

There are no Public Rights of Way (PRoW) directly adjacent to the application site; however, two PRoWs are located along the River Calder, approximately 50m to the south of the site, being footpaths DEW/118/10 and DEW/119/10. Several PRoWs are also located further north in the Eastborough area.

Figure 2 shows the location of the two PRoWs near the site.

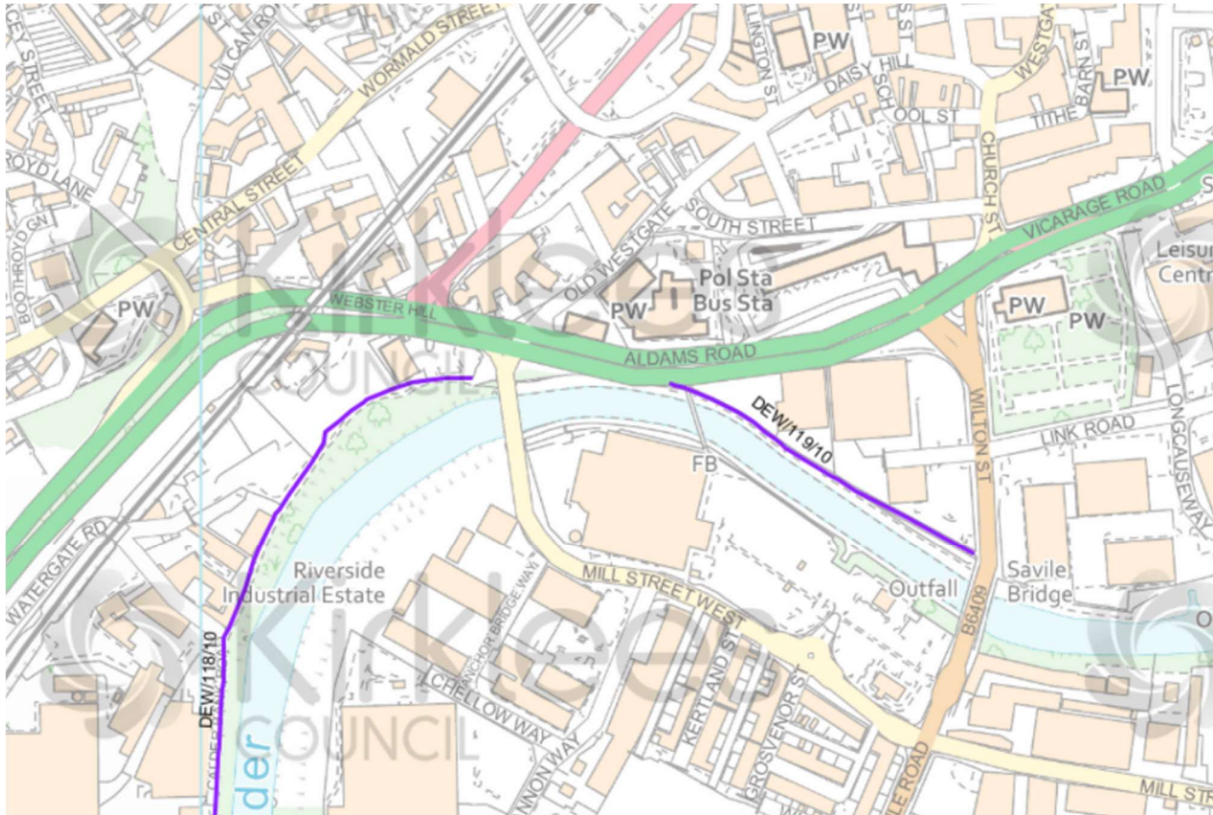


Figure 2: PRoWs near Dewsby Bus Station (source: Kirklees Council PRoW maps)

In terms of cycle routes there are no Sustrans routes within the application site; however, National Cycle Network Route 69 is located approximately 50m to the north of the site. This runs north along Old Westgate and Daisy Hill and then turns south along Long Causeway (130m from the site), as shown in Figure 3.

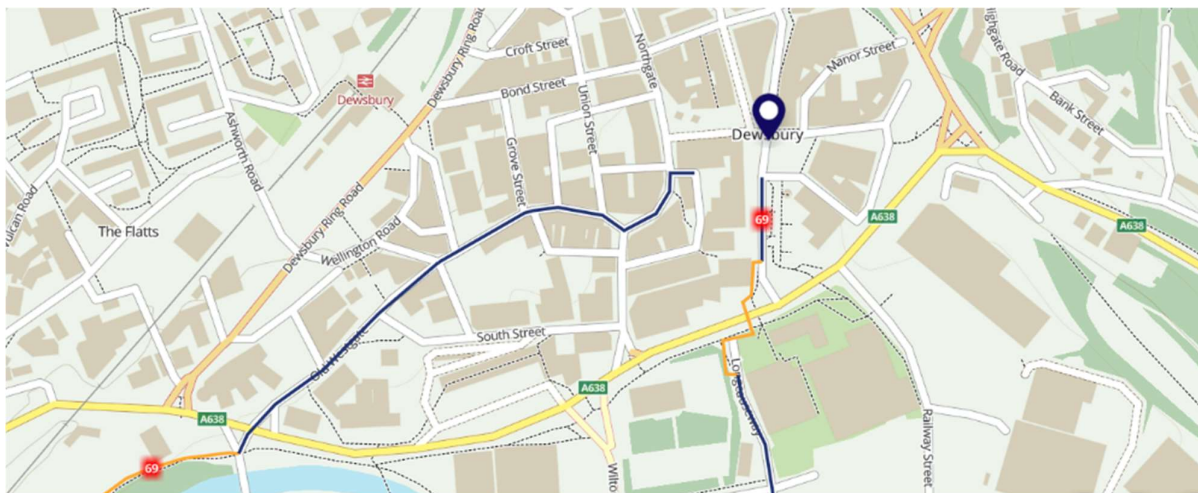


Figure 3: National Cycle Route 69 near the application site (source: Sustrans OS Maps)

2.5 Heritage

The Dewsby Town Centre Conservation Area is located approximately 70m to the north of the site.

The site lies in the immediate setting of the Grade II* listed Dewsby Minster and several other Grade II* listed buildings are located in the vicinity, with the closest being Dewsby Town Hall and 11 Market Place.

Planning Statement

There is also an unlisted asset of community value, being the late medieval Moot Hall/Rectory Manor within the site. Further information is provided in Section 4.3 of this report.

3. The Scheme

3.1 Introduction

The Scheme comprises an improved 'fit for purpose' bus station at Dewsbury to provide greater access to the town centre. The changes are considered to contribute to LCR's goal of being a carbon neutral economy by 2038. The Scheme aims to improve access to the bus station and refurbish the internal building to a higher standard, as well as offer opportunities to improve the energy efficiency on site.

Overall, the Scheme aims to enhance the appearance of the bus station, improve accessibility within the bus station and also to the town centre, as well as boosting pedestrian and cycle access to the site. The Scheme is composed of the following:

- Refurbishment of the bus station building to a higher standard (internal concourse)
- Provide additional passenger facilities, including improved seating, a Changing Places toilet and a quiet room
- Re-configuration of the existing retail units to rationalise the retail offer and improve accessibility around the bus station entrances
- Building entrance improvements including glazing and a proposed glazed atrium between South Street and Aldams Road to improve the sense of place
- New roof glazing to increase natural daylight in the passenger concourse area
- External building cladding and glazing to rationalise the existing elevations, project a suitably high-quality image and improve thermal insulation
- Strengthening signage and wayfinding to improve integration and accessibility
- Reconfiguration of the bus apron area to improve safety, efficiency and accessibility
- Landscaping and boundary improvements
- New contractor parking with an EV charging point
- Sustainability improvements to contribute to carbon reduction and energy efficiency, including photovoltaic (PV) panels on the flat and pitched roof, and an area of new green roof
- Improved pedestrian linkages through the bus station to improve connectivity
- Integration with Kirklees Council's Aldams Road and South Street walking and cycling proposals

As noted in Chapter 1, together, the above improvements aim to:

- Encourage more people to visit Dewsbury Bus Station
- Transform passenger facilities
- Improve access and safety for all bus station passengers
- Attract new retail business and improve people's experience
- Help regenerate Dewsbury town centre in line with the Dewsbury Blueprint
- Make the bus station more energy efficient and reduce carbon emissions

Further information regarding the Scheme is provided in Sections 3.2 to 3.7 below, on the drawings submitted with the application, and in the DAS.

3.2 Bus Station Building

The bus station building is to undergo comprehensive refurbishment, utilising the existing structures where possible; however, new retail units are to be constructed to overcome existing structural, thermal insulation and layout issues and the mall circulation area is to be provided with a new ETFE roof structure. A green roof will also be provided, which will be planted with individual plug plants using British native plant species to encourage biodiversity.

The bus station building will be reconfigured to provide a passenger concourse and mall, three retail units, and staff/public facilities, comprising of:

- Combined bus station manager and security office
- Staff rest room and kitchenette
- Accessible staff toilet and shower
- Cleaner's store
- Cleaning machine store
- General store/staff cycle store
- Plant room
- Four roof access ladder/stair enclosures
- ATM room
- Customer information desk
- Public toilets, including an accessible toilet and Changing Places toilet (note: The existing male, female and accessible passenger toilets have been recently refurbished and are retained unchanged from existing)
- Quiet room

The materials for the proposed bus station have been chosen to achieve the desired transparency between internal and external public spaces, whilst also referencing the traditional constructions and colour palettes of the town centre. The new stone and zinc rainscreen cladding systems have been proposed to provide an appearance of weight and permanence, which was inappropriately absent from the existing bus station building.

3.3 Access and Parking

3.3.1 Pedestrian Access

Pedestrian entrances to the bus station are located at the north and south of the mall, off South Street and Aldams Road respectively. A further pedestrian entrance is located at the western end of the passenger concourse with access off Aldams Road. No changes are proposed to the off-site access routes or pedestrian crossings.

New pedestrian crossings are provided across each of the vehicular site entrances and bus runways. Other than the crossing at the southeast exit these are not signalised crossings; however, their location has been adjusted from existing to better respond to pedestrian desire lines. The pedestrian barriers, railings and planting have been designed to reinforce the safe circulation routes. Each crossing has tactile paving which is designed in accordance with the requirements of the DfT publication '*Guidance on The Use of Tactile Paving Surfaces*'.

Access to and from the buses is possible at each bus stand and drop-off stand location. The setting out of the kerb lines and bus overrun barriers have been completely re-configured to permit access to the full range of

buses currently in service and to provide sufficient circulation space for wheelchair users to board when the bus access ramps are deployed.

Induction loops are provided within the roadway under each bus bay. These ensure that the automatic doors which lead from concourse to bus boarding areas are only able to open when a bus is at the stand, reducing the risk of pedestrians gaining unauthorised access onto the bus runways from the building. The system can be overridden to open the doors and permit emergency evacuation in the event of a fire or terrorist incident, during which scenario buses would not be permitted to enter the bus station running lanes.

3.3.2 Cycle Access and Parking

Cycle access is currently provided to the existing bus station via on street access using the local highway network; however, Kirklees Council are currently developing proposals for improvement of the cycle network which will see a combination of dedicated cycle routes and shared pedestrian and cycle routes introduced along Aldams Road.

New covered cycle parking will be located at each of the main building entrances. A minimum of four stainless steel Sheffield style cycle hoops are to be provided under each shelter and secured in accordance with manufacturer's recommendations to minimise risk of theft. This provides a total cycle parking provision for 24 cycles at the bus station. An additional four staff cycle parking spaces are provided within the internal storeroom adjacent to the northeast building entrance.

3.3.3 Bus Access and Parking

Bus access is possible from the northeast vehicular entrance from South Street and from the southwest vehicular entrance from Aldams Road. Bus exit from the site is possible only via the signalised south eastern vehicular exit onto the junction of Aldams Road, Vicarage Road and the B6409.

To the northern side of the bus station building there is a bus drop-off stand and three shallow sawtooth Drive-in Drive-Out (DIDO) bus stands. To the southern side of the bus station building are 15 DIRO bus bays.

The bus layover bays have been re-located around the perimeter of the bus station running lane, providing an increase in numbers from the existing four to the proposed seven bays and providing improvements in operational flexibility. Dedicated walkways are provided to create clearly demarked safe walk zones for drivers moving between their vehicles and the building.

3.3.4 Service and Maintenance Vehicles

Two staff and contractor car/light vehicle parking spaces are provided to the southern boundary of the bus station, adjacent to the Aldams Road boundary wall. The spaces are provided with an EV charging point. Vehicles enter the site via the southwest entrance from Aldams Road and exit via the southeast vehicle exit onto the junction of Aldams Road, Vicarage Road and the B6409.

An additional maintenance vehicle, bay suitable for small light goods vehicles, is at the eastern end of the bus DIRO bays. This bay is secured with removable bollards in order that it is designated for authorised and occasional maintenance use only.

The bus drop-off bay adjacent to the northeast entrance has been allocated to provide service drop-off provision for larger vehicles. Vehicles would access from South Street and would exit via the southeast vehicular exit onto the junction of Aldams Road, Vicarage Road and the B6409.

3.3.5 Taxis

Taxi rank provision is to remain, unaltered, on South Street. The pedestrian crossing alignment between taxi rank and the bus station building has been revised to better sit on the pedestrian desire line and to provide improved safety.

3.4 Bin Store

A new, lockable bin compound for six 1,100 litre general waste and mixed recycling bins is to be constructed to the rear of the retail units, for security and to improve the aesthetic quality of the public space. Bin lorries will be able to continue to collect from on-street pull-in along Aldams Road as existing, which is approximately 28m from the proposed retail unit bin store. An additional off-street service bay is also available within the bus station, which is 75m from the proposed bin store. No refuse will be moved, removed or placed outside of the designated areas prior to collection.

Discussions have been held with Kirklees Council to confirm arrangements for the proposed streetscape alterations along Aldams Road. As part of the design coordination between the two projects it is proposed that a dedicated service vehicle pull in bay will be provided on Aldams Road, to provide refuse vehicle parking within 20-25m of the proposed retail unit bin stores. The combined scheme will provide traditional storage and collection methods in line with policy and existing practices currently employed by Kirklees Council.

3.5 Lighting Strategy

The lighting design for the Scheme is shown on Drawings B2382808-JAC-XX-GF-DR-E-1111 – 1113, and B2382808-JAC-GEN-XX-DR-ZZ-3009.

3.5.1 External Lighting

At RIBA Stage 3 the lighting design for the external areas provides a minimum level of illumination for the primary bus circulation route through the bus station, with enhanced values at the formalised pedestrian crossings. At the extremities of the site, where little or no pedestrian activity is anticipated (such as the landscaped areas near the perimeter), lower levels of illumination are proposed.

A new electrical service route around the perimeter of the site is proposed. This will provide supplies for electrical equipment, external lighting and communications cabling. Feeder pillars will provide local power to this external equipment and will be fitted with consumer units, network switches and associated control equipment to allow external lighting and control systems to link with the internal systems.

The bus boarding areas in close proximity to the main building are not covered by the external lighting design, as these areas have been considered as part of the building lighting.

The lighting design for the external areas of the bus station has been undertaken in accordance with two standards:

- BE EN 12464-2:2014, Table 5.9, Ref. 5.9.3, which requires 20 lux with a uniformity of 25%. These minimum levels have been used for the primary bus circulation area.
- BS EN 13201-2:2015 was used for the lighting design at pedestrian crossings. This standard prescribes the minimum requirements for conflict areas and provides a class of lighting that is higher than for the other parts of the bus circulation area. Class C1 from Table 2 has been applied, providing a minimum of 30 lux with a uniformity of 40%.

Other sources of lighting in the area immediately beyond the bus station extents have not been taken into account. The lighting on Aldams Road comprises LED units, which are assumed to provide no back light. The lighting on South Street is considered to possibly be near end of life, so any contribution to the lighting of the bus station cannot be relied upon. Also, as there is no control over the hours of operation of other sources of lighting, any reliance on these sources is not recommended.

At RIBA Stage 4 design the Contractor will be required to produce, as part of the detailed design, a comparison between the existing and proposed external lighting situations, to report on the potential impact of the proposals on the wider environment, such as light pollution. In completing the detailed design, the Contractor is required to consider the following:

- Lighting approach criteria - to determine which areas of the site will require external lighting, and the location and duration of lighting based on the activities and usage of the operators of the site

- Luminaire locations and orientation – where practical to minimise the impact on wildlife and to avoid directing light into environmentally sensitive areas
- Luminaire distribution – use of luminaires with controlled lighting distributions to project light in a downward plane only, in order to control the spread of light, avoid unwanted light spill and limit light pollution and night glow
- Lighting control – use of photocells, sensors or time clocks to adjust the brightness and timing of the lighting system. All external devices to link with the new DALI control system within the bus station.

During construction works, existing street lighting adjacent to the highway shall be maintained at the current levels at all times. Existing street lighting shall not be removed until new lighting systems are operational or temporary lighting is provided.

3.5.2 Internal / Building Lighting

The current lighting and emergency lighting system within the building is outdated and will be replaced. A new lighting and emergency lighting system will be designed to current British and CIBSE standards providing a greater output of light than the current system and improving safety within the bus station.

LED luminaires have been selected with outputs generally greater than 100 lm/W and greater than 120 lm/W in some instances.

Perimeter lighting has been provided around the building to illuminate the stands to the required lux levels and provide emergency illumination in the event of an escape situation.

A new DALI lighting control system has been proposed allowing for individual control, grouping and zoning of luminaires and allowing for utilisation of PIR detectors operating in presence/absence detection.

Where a large quantity of glazing is provided (generally in the concourse and circulation spaces of the building), daylight linking via photocells has been provided ensuring daylight is used as the primary source when sufficient daylight is provided.

The DALI lighting control system shall be monitored through the ICT network. Remote DALI controllers shall be installed within the external feeder pillars to allow for external lighting to be controlled and monitored over a single system.

Emergency lighting has been provided via emergency backed general lighting to reduce the quantity of luminaires in the ceiling. Emergency lighting is linked back to the DALI lighting control system, removing the need for field testing of the equipment.

3.6 Landscaping

The landscaping proposals for the Scheme are shown on Drawing B2382808 JAC GEN XX DR L 3001 (Landscape General Arrangement). Wall and planting details are shown on Drawing B2382808 JAC GEN XX DR L 3002 (Wall and Planting). The landscaping proposals have been split into zones as shown in **Figure 4**.

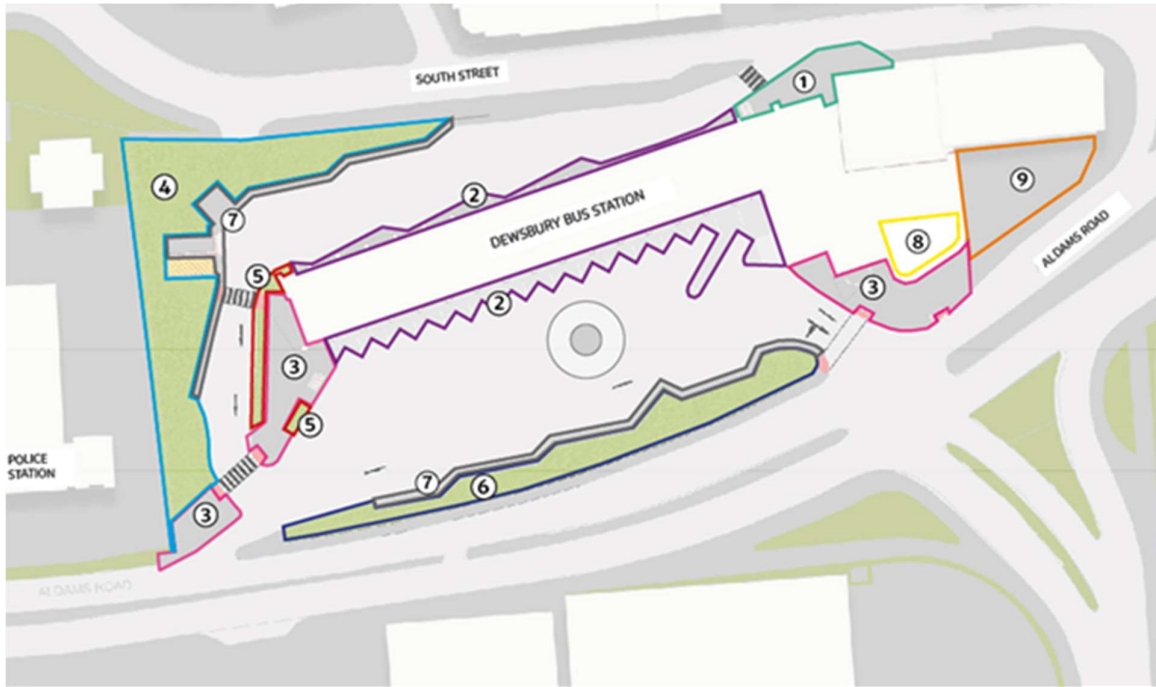


Figure 4: Landscaping zones

Details for the soft and hard landscaping proposals for the Scheme are provided below.

3.6.1 Soft Landscaping Proposals

The site has been grouped into zones to provide visually distinct areas that are different in character, but the use of a common palette of spring and summer flowering bulbs will be consistent across the zones. This pattern will visually unify the Scheme.

The zones for soft landscaping are listed below:

- Zone 4 - Grass and tree planting (Drawing B2382808 JAC GEN XX DR L 3004 (Zone 4 Planting))
- Zone 5 - Low maintenance ornamental planting (Drawing B2382808 JAC GEN XX DR L 3005 (Zone 5 Planting))
- Zone 6 - Aldams Road Planting (Drawing B2382808 JAC GEN XX DR L 3006 (Zone 6 Planting))
- Zone 8 - Green roof (Drawing B2382808 JAC GEN XX DR L 3001 (Landscape General Arrangement))
- Zone 9 - Pocket Park (Drawing B2382808 JAC GEN XX DR L 3007 (Zone 9 Planting))

The objective for the soft landscape scheme is to provide a safe, visually attractive environment based on sound ecological principles. The proposed planting style will look to use clear stem trees with light canopies, robust low maintenance ornamental shrub planting, herbaceous planting, ornamental grasses, and species rich grass with wildflowers.

The soft landscape design has been developed in conjunction with the project ecologist and the planting will aim to complement the existing site and local character, mitigate against any existing habitat loss, and improve the existing sites biodiversity. The creation of varied habitats throughout the site will enhance biodiversity whilst ensuring that passengers, staff and visitors maintain a link to their local natural world. The landscape will provide an attractive year-round setting offering an enjoyable environment.

Further development of a detailed plant schedule will be undertaken. The final plant selection will be completed following consultation with Kirklees Council, especially in areas along Aldams Road where significant highways work and public realm enhancements are currently under discussion.

3.6.2 Hard Landscaping Proposals

Hard landscaping proposals for the Scheme are shown on Drawing B2382808 JAC GEN XX DR L 3003 (Hard Landscape Details). The material strategy seeks to provide a hierarchy of finishes which respond to both the spatial usage and context of the site. Materials have been chosen to complement the new modern bus station and to be robust, functional, low maintenance and to suit the needs of the users. A simple palette of hard landscape materials has been selected and includes Yorkstone paving at the main entrance. Complementary good quality concrete paving for passenger and boarding areas and an asphalt surface from maintenance and service areas. Kerbs and edgings have been selected to complement the adjacent paving.

3.7 Construction Phase

Information regarding construction and the required traffic management is set out in the CTMP. Details regarding the setup of the construction compound, timing of works, and construction phases are outlined below.

A construction compound will be located within the existing Dewsbury Bus Station and will be designed to serve as primary assembly, storage of materials, plant equipment and welfare facilities. Multiple compound sites are not anticipated during the construction works; however, it is likely that the location of the compound will move over the various construction phases.

In order to enable compound set up, initially the access will be set up at the compound, including vegetation clearance of the highway and field boundaries, highway junction works and traffic control (where required). Following this, a range of works will be undertaken to construct the compound, install utilities and act as a base for equipment and staff. Following construction of the compounds, preliminary activities will be undertaken from the compounds including:

- Vegetation clearance, where this has not already been undertaken as part of recent maintenance, if seasonally appropriate and in accordance with licenses
- Temporary highway works for example site and junction improvements
- Environmental mitigation works where required
- Delivery and movement of construction materials
- Sorting and storage of materials arising from the preliminary works

The majority of works will be carried out during the working hours of 7am to 6pm on Mondays to Fridays and 8am to 4pm on Saturdays. To ensure the bus station can continue to be operational throughout construction, work may need to be undertaken outside these hours; however, the appropriate permissions will be sought, and the contractor will liaise with Kirklees Council and bus operators throughout construction.

The construction will be completed in phases over a period of 19-months, commencing in January 2024 and completing in August 2025. The five construction phases are outlined in Appendix C of the CTMP.

A Construction Environmental Management Plan (CEMP), Site Waste Management Plan (SWMP), and Materials Management Plan (MMP) will also be prepared for the Scheme, following the appointment of a Contractor.

4. Environmental Considerations

4.1 Flood Risk Assessment

Within the Study Area (area within 1km of the site) there are two Statutory Main Rivers. The main water body is the River Calder, which lies around 60m southwest of the site. Batley Beck lies approximately around 100m to the east of the site.

The majority of the site is within Flood Zone 1 (1 in 1,000 annual probability of river flooding). The southern end of the site is within Flood Zone 2 (an area with between 1 in 100 and 1 in 1,000 annual probability of river flooding). There are areas that are in Flood Zone 3 (an area with greater than 1 in 100 annual probability of river flooding) within 50m of the site.

Discussions have taken place with the Lead Local Flood Authority (LLFA) who have confirmed that a sequential test and an exception test is not required for the Scheme.

The FRA for the Scheme evaluates the potential risk of flooding in and around the site. It identifies that *"there is an existing flood risk to a part of the site from fluvial, surface water and groundwater flooding. Although this flood risk includes areas of Flood Zone 2 and potential areas of high risk of surface and groundwater flooding it is considered that there should be no significant increase in flood risk due to the development. It is expected that there will be a reduction to the impermeable area through incorporation of new landscaped areas which may contribute to improved interception of more frequently occurring rainfall events"*.

4.2 Surface and Foul Water Drainage Strategy

4.2.1 Surface Water Drainage

The indicative drainage design for the Scheme is shown on Drawing B2382808-JAC-GEN-XX-DR-ZZ-3010. Due to the significant number of chambers that could not be opened during the underground services survey, the drainage design proposals presented at this stage are preliminary and are based partly on assumption. Maintenance of the defective chambers will need to be undertaken so that the survey can be completed.

Given that a net decrease in impermeable area is proposed, it is considered that surface water discharge control and associated surface water attenuation will not be required.

Along the southern edge of the site, the existing gullies made redundant by the repositioning of the kerb line are to be abandoned, and new gullies will be installed at appropriate locations. The new gullies will discharge to the existing surface water sewer (ownership, dimensions, and levels undetermined) that traverses the southern kerb line. Gully outlets will be rationalised and will re-use the existing connection points to the surface water sewer, thus avoiding the need for on-line connections to a live drainage system.

The northern and western areas of the site will also require the abandonment of existing gullies and the installation of new gullies to match revised kerb alignments. The location of existing surface/combined water sewers in this area of the site has not been established. As such, potential points of discharge for the majority of these new gullies have yet to be determined.

The drainage proposals for the Scheme are for the provision of surface water drainage linked with pollution prevention measures, such as hydrocarbon interceptors, raingardens, and catchpits prior to discharge into surface water systems. Penstocks and storm water containment will be needed to restrict fire water runoff in the unlikely event of a fire. No infiltration measures are allowed as part of the Scheme owing to the risks associated with contaminants in the groundwater. The building will need to have its own separate network to collect storm water flows generated from building roofs and hardstanding areas via downpipes, gullies and linear drainage channels where necessary.

The Contractor will be responsible for the detailed design and construction of the new storm water drainage system and for any alterations to the existing network serving the site area. The following principles have been specified for the design of any new sections of storm water drainage:

- No surface flooding for a 1 in 30-year (plus 40% for climate change) return period event

- Any flooding which occurs during a 100-year storm event (plus climate change) will be controlled on site

The new system will be a gravity system and will need to connect to the existing drainage network. The Contractor will undertake necessary drainage surveys and checks on the available capacity in the existing systems, and obtain confirmation and approval from the LLFA that the storm run-off can be discharged to the existing networks.

4.2.2 Sustainable Urban Drainage System

Kirklees Council's pre-application advice acknowledged that the installation of a new on-site sustainable drainage strategy may present some difficulties (see Appendix A). It advised that the LLFA should be contacted prior to the submission of a planning application to discuss the feasibility of such an approach, as well as other potential options for the betterment of the local drainage and water environments. The Applicant contacted the LLFA in January 2023 and it was confirmed that a full Sustainable Urban Drainage System (SuDS) requirement is not appropriate given the nature of the refurbishment, the area of hardscape is reducing, soft landscape is increasing and levels are remaining consistent with existing.

The FRA for the Scheme reviews the requirements for SuDS and states *"As this site is a redevelopment of an existing site there is limited opportunity to provide new SuDS. The proposed design does include for a reduction in the impermeable area of the site through provision of new landscaped areas. It is expected that this increase in landscape areas will increase interception of water on the site and reduce the total run-off from the site"*.

4.2.3 Foul Water Drainage

The foul drainage loading will remain as per the existing site configuration. Whilst a remote connection agreement may be necessary (confirmation of discharge point will be provided upon completion of the remaining drainage surveys), it will be made on a like-for-like basis, with no anticipated additional network loading envisaged. The Contractor will be responsible for the detailed design and construction of the new foul drainage systems and for any alterations to the existing system.

The existing services drawing (Drawing B2382808-JAC-GEN-XX-DR-ZZ-3007) indicates that the foul drainage flows generated by the existing bus station site are generally collected and discharged to the public sewer system. There will be a requirement for grease traps within the foul water systems within retail units to ensure drainage flows are treated to a suitable quality before being discharged to the existing drainage system.

The levels, condition and capacity of the existing network and associated foul infrastructure are unknown. The Contractor will be required to survey and report on the condition of any part of the existing network to be retained as part of the designed Scheme.

4.3 Heritage Statement

The Planning and Environmental Consenting Strategy by WSP (Reference: 70077924), dated February 2022 (see Appendix C), contains information for the historic environment in Section 3.3 of the report. WSP undertook a review of heritage assets within a 1km Study Area from the site. The Heritage Statement provided below relies on information in this report.

4.3.1 Listed Buildings

There are no listed buildings within or adjacent to the site boundary. There are 47 listed buildings within 1km of the Scheme consisting of one Grade II* listed building and 46 Grade II listed buildings. The closest listed building to the site is the Church of All Saints, also called Dewsbury Minster (NHLE 1134712), located 50 m east of the site, a multi-period parish church with sections dating to the 13th, 14th, and 15th centuries and alterations and renovations dating to the 18th and 19th centuries.

4.3.2 Registered Parks and Gardens

There are no registered park and gardens within the site. There is one registered park within the Study Area, the Grade II listed Crow Nest Park (NHLE 1001516) 850m southwest of the site.

4.3.3 Scheduled Monuments

There are no scheduled monuments either within the site boundary or within the Study Area. The closest scheduled monument to the site is the Thornhill Hall and moat (NHLE 1009930), including sites of formal gardens, bowling green, and remnants of pre-17th century open-field system located approximately 3.1km southeast of the site.

4.3.4 Conservation Area

The site does not lie within the boundaries of a conservation area but does lie approximately 70m to the south of the Dewsbury Town Centre Conservation Area as designated by Kirklees Council in 1981.

4.3.5 Buried Remains

A review of non-designated heritage assets obtained from the West Yorkshire Historic Environment Record has been undertaken to ascertain the potential for buried heritage remains within the site. One non-designated asset is shown extending into the site and an additional 27 non-designated assets are present within the 50m Study Area. The non-designated asset within the site consists of the site of the late medieval Moot Hall/Rectory Manor (MWY3767). It is thought that the foundations are still extant below the existing road surface suggesting that there is potential for survival.

4.3.6 Assessment

The area of the Scheme was included in two desk-based assessments, one on the Dewsbury Minster (EWY6656) and the other on Dewsbury Town (EWY7525). No physical archaeological investigations have been undertaken within the site but a watching brief was undertaken within the Dewsbury Minster churchyard in 1999 (EWY6163), 35m to the southeast of the site boundary. Investigations recorded several buried tombstones and graves thought to be post-medieval, and the foundations of stone-built walls identified as the remains of foundations of the 14th century vicarage which had been demolished in the early 1800s. There will be no physical impacts to these assets from the Scheme and given the nature of the Scheme there is unlikely to be no change to the setting of these assets. This has been confirmed in consultation responses from Kirklees Council.

All of the non-designated assets within the Scheme and the 250m Study Area are presented in detail in Appendix C.

There is the potential for further buried heritage remains to be present within the Scheme. However, given the historical disturbance from development this is limited. From the review of the above data, it is likely the majority of the buried heritage remains within the site are likely to be related to the late 13th century Moot Hall/Rectory Manor extending into the southeast of the site. To the north and west of the site, potential is likely limited to post-medieval and early modern remains related to the expansion of Dewsbury as a result of the North England textile manufacturing industry.

Remains related to the Aldam Mill immediately to the west of the site may extend into the west of the site. There is also potential for earlier remains, in particular of the medieval periods, concentrated to the south and east of the site around the Church of All Saints (Dewsbury Minster) and it is likely that the church served as a focus for activity in the area during these periods.

In regard to buried archaeology, construction of the Scheme will not disturb grounds that would not already have been disturbed by the construction and modifications of the existing bus station in 1994. The majority of works is above ground and deals with the resurfacing of existing hardstanding, new facades, roofs and canopies on the bus station building and an internal refresh or services and decoration. There is no expansion of majority constructions outside of the existing buildings footprint. As such, the likelihood of buried archaeology being unearthed during construction is very low.

4.4 Ecological Assessment

The Planning and Environmental Consenting Strategy by WSP (Reference: 70077924), dated February 2022 (see Appendix C) provides an overview of the key environmental constraints for the Scheme. Further, an Ecological Constraints Assessment and Preliminary Bat Roosting Assessment was prepared for the Scheme by WSP (Reference: 70077924, 001) in January 2022.

As noted above, details for the Scheme included in WSP's reports have not changed to the degree that impacts described/method statement details are now inaccurate. As such, these reports have been relied on for the assessment.

To provide the baseline data for the ecological desk study, information was requested from West Yorkshire Ecology Service for a search area of 2km from the central grid reference of Dewsbury town centre. Relevant information from WSPs reports is provided below.

4.4.1 European and Nationally Designated Sites

There are no European or Nationally designated sites within the Study Area (Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) or Ramsar sites). The nearest designated site is 6.1km south of the Scheme at Denby Grange Colliery SSSI and Denby Grange Colliery Ponds SAC.

There are no Local Nature Reserves (LNR), located within the Study Area. However, the nearest LNR is located 1.1km south of the Scheme, at Sparrow Wood. Additionally, these Lower Spen Wildlife Area LNR is located 1.6km southwest of the site.

4.4.2 Ancient Woodland

There are no ancient woodland sites within the Study Area. There are also no trees with veteran or notable status within the Study Area.

4.4.3 Local Wildlife Sites

There are no Local Wildlife Sites (LWS) located within the Study Area. However, Sparrow Wood LWS19 (3.58 ha) is located 1.1km south of the site boundary. Similarly, Lower Spen Wildlife Area is also an LWS and is located 1.6km southwest of the site.

4.4.4 Protected or Notable Species

A Preliminary Bat Roost Assessment survey was conducted in October 2021 as detailed in Section 4.5 of this report.

There has been one record of a Great Crested Newt 1.45 km northwest of the site, but no suitable waterbodies have been found within 500m of the site.

There is no evidence to suggest that the building on site is used by nesting birds. The ornamental and immature trees in the southeast, southwest and northwest corners of the site provide habitat suitable for nesting birds. A pair of feral pigeons were recorded nesting in a cherry tree in the southwestern corner of the site. Nesting opportunities on the buildings themselves are limited, although some potential may exist within the horizontal roof slats of the building to the southeast of the site; however, no nests were identified during the survey. Potential foraging and breeding habitat may be lost / disturbed by the Scheme if tree and vegetation clearance is required.

4.4.5 Priority Habitats

There are numerous areas of deciduous woodland (part of the Priority Habitat Inventory (HPI) priority habitats within the Study Area. The nearest site is approximately 30m away from the site, located in the cemetery of Dewsbury Minster. There is also an area of Wood Pasture and Parkland HPI located approximately 1km to the west of the site. The River Calder is also classed as Freshwater River HPI, and is located less than 0.1km south of the site.

4.4.6 Invasive Non-Native Species

Both Japanese Knotweed (*Fallopia japonica*) and Himalayan Balsam (*Impatiens glandulifera*) have been recorded at OS grid reference SE2442149. This is approximately 150m south of the site along the River Calder. Giant Hogweed (*Heracleum mantegazzianum*) was also found at OS grid reference SE249212, approximately 400m southeast of the site.

4.4.7 Ecological Constraints Assessment

Chapter 4 of the Ecological Constraints Assessment considers the potential for effects for legally protected species as a consequence of the Scheme. Section 4.1.2 advises that the Walk Over Constraints Survey highlighted the presence of habitats which have the potential to support protected species within or adjacent to the site. These include bats and breeding birds.

The site boundary was amended slightly following the completion of the Ecological Constraints Assessment to incorporate additional areas of hardstanding at the South Street access. However, as this area is hard standing, the Scheme will not impact on any additional habitats. As such, WSP's recommendations and suggested mitigation have not changed.

Section 4.2 of the Ecological Constraints Assessment outlines recommended mitigation and avoidance measures for the Scheme to enable compliance with relevant legislation. The following measures were recommended for bats and birds.

4.4.7.1 Bats

See Section 4.5 of this report.

4.4.7.2 Birds

Section 4.2.7 recommends mitigation and avoidance measures should the Scheme require the loss of habitat which is considered suitable for nesting birds, including loss of introduced scrub and immature trees. These are as follows:

- Vegetation clearance and/or the felling of trees should be undertaken outside the bird nesting season, which is defined as March to August inclusive
- Where clearance is proposed within the bird nesting season, it shall be preceded by an ecological inspection by a suitably experienced ecologist to identify the presence of active nests
- Should an active nest be recorded, a suitable buffer (5m minimum) shall be implemented and remain in place until the nest is no longer active

Section 4.2.8 outlines environmental best practice and recommends general environmental protection measures for implementation during the construction phase of the Scheme. Minimum standards are also outlined.

The measures outlined in the Ecological Constraints Assessment will be incorporated into the CEMP for the Scheme.

4.5 Bat Roost Assessment

The Preliminary Bat Roost Assessment by WSP determined that trees recorded in the eastern extent of the site are not suitable for roosting bats. However, there are roosting features for bats within the site, which have been classified as offering 'Low' roosting potential. These roosting features include the roof of a staff canteen in the southeast corner of the site, with gaps behind a metal fascia and roof overhang. This building will be directly impacted by the Scheme therefore there is potential for the loss of habitat for roosting bats.

A potential roost feature (gap in the brickwork where a waste pipe exits) was recorded on the southern aspect of a building (currently vacant) adjacent to the northeast of the site. A larger area of woodland which may provide more suitable roosting and foraging habitat exists off-site, directly southeast, but is separated from

the site via Aldams Road. This suggests there is some limited connectivity to the site for bats via suitable habitat.

A further survey in the form of a dusk emergence or pre-dawn re-entry survey is recommended.

General mitigation and avoidance measures are outlined in the Preliminary Bat Roost Assessment and advise that these measures will be reassessed following the completion of the further survey. However, general good practice approaches are outlined, being:

"It is recommended that night work, especially between dusk and dawn, is avoided to reduce disturbance to bats leaving/returning to their roosts. It is recommended that any artificial lighting used as part of the Proposed Scheme, is designed and erected in accordance with guidelines from the Bat Conservation Trust (BCT) and Institution of Lighting Professionals (ILP) (BCT and ILP, 2018) to reduce indirect impacts to retained structures or trees within and adjacent to the Site, should roosting bats be present.

Recommendations include:

- *Avoidance of direct lighting of buildings and trees that may be suitable to support roosting bats and habitat of value to foraging and commuting bats (such as hedgerows, woodland, and trees)*
- *Avoidance of light spill using directional and or baffled lighting*
- *Positioning of lighting columns away from habitats of value to foraging and commuting bats*
- *Reducing the height of lighting columns to reduce the light spill onto adjacent habitats*
- *Variable lighting regimes (VLR) – switching off when human activity levels are low i.e. 21:00 to 05:30".*

Suitable measures will be incorporated into the lighting scheme for the site.

4.6 Arboricultural Assessment Report

An AAR was prepared for the Scheme in December 2021 by WSP (reference: 70089130-ARB-001). The AAR details the results of the site Arboricultural Survey and includes an AIA and an AMS.

Details for the Scheme included in WSP's report have not changed to the degree that impacts described/method statement details are now inaccurate. Also, the surveys are still in date. As such, this report has been relied on for the assessment.

The ARR confirms that the following are not located within the application site:

- Tree Protection Orders
- Conservation areas (although Dewsbury Town Centre Conservation Area is located 70m to the north of the site)
- Ancient woodland, ancient, veteran or notable trees (on or adjoining the site)

A site walkover determined that there were 17 trees within the site, 11 of moderate quality, five of low quality and one that is not worthy of retention.

Section 4.4.1 of the AAR advises that *"The proposed scheme has been designed so that, where possible, existing trees are retained. The majority of the trees are situated on the boundaries of the site, which provide good screening value from wider vantage points beyond the site and provide an established level of privacy. The majority of these are to be retained. However, the site will be subject to redesign with the Proposed Scheme not able to be retro-fitted into the existing site layout without inevitable impacts to the existing tree cover".*

The redevelopment of the bus station site will require the removal of five trees, with three trees being of moderate quality, one of low quality, and one that is not suitable for retention. The trees to be removed are identified on the Preliminary Tree Protection Plan, in Appendix F of the AAR. In order to mitigate the removal of these trees, the Scheme includes a landscape design which will introduce native tree planting which can

improve the quality and diversity of trees on the site. Replacement planting of 14 trees is proposed. Drawing B2382808-JAC-ELS-XX-DR-L-3001 shows the overall landscaping proposals for the Scheme.

The Scheme has been designed so that major works are not required within the Root Protection Areas (RPAs) of retained trees. However, as detailed in the AAR, there are some aspects of the Scheme that will require works to be undertaken within the RPAs of retained trees, including six moderate trees and one low quality tree. Tree protection measures will be in place during the construction phase, including arboricultural supervision and tree protection fencing as detailed in the AMS in Appendix G of the AAR.

The AAR states in Sections 5.1.7 and 5.1.8 *"In summary, it is considered that the Proposed Scheme of the site will not have a significant impact upon the visual amenity of the local area as a result of the proposed tree removal necessary to implement it, nor will it greatly impact to the existing arboricultural resource to its detriment. Additionally, the proposed works are unlikely to impact significantly upon the long-term health of retained trees."*

There is the potential for a net gain in amenity value and tree canopy cover if the existing trees on site are supplemented with additional new tree planting. Whilst some works are to be undertaken within the RPAs of retained trees, these aren't deemed to be at detriment to the trees with many of the trees along the sites southern boundary already coexisting with grey infrastructure impacting on their perceived rooting environment. The nature of the proposed works are such that they can be completed without impacting significantly upon the trees subject to the adoption of an appropriate working methodology as outlined in the AMS included as Appendix G".

The Scheme will be constructed in line with the recommendations of this report, and mitigation measures will be detailed in the CEMP.

4.7 Biodiversity Net Gain Report

A Biodiversity Net Gain Report has been prepared for the Scheme, which calculates the losses and gains in biodiversity units as a result of the Scheme, and outlines opportunities for habitat creation to achieve a net gain in biodiversity. The report concludes in Chapter 4 that the Scheme represents a net gain of 2.20 habitat units (395.05%) and will generate an additional 0.13 hedgerow units. The report also advises that a detailed management and monitoring plan is required to make sure the habitats reach the target condition.

4.8 Transport Statement

A TS in accordance with national and local guidance has been prepared for the Scheme. This document considers the accessibility to and from the site by all modes of transport, focussing mainly on the sustainable modes of walking, cycling and public transport before assessing the impact of the proposals on the local highway network.

Section 8.1 of the TS states *"Improvements to Dewsbury Bus Station will make travel by bus a more attractive modal choice, as well as contributing to the bus station itself being a place where people sense they are 'arriving' into the town. This will support a push to increase the number of people using the town centre and accessing opportunities across the wider region. With these improvements, it is hoped that bus journeys and multi-modal travel could be seen as a safe and viable alternative to the private vehicle. The purpose of this TS has been to consider the highway and transport implications of proposed transformation of the Dewsbury Bus Station. From the results of the report, the following can be concluded:*

- The site is located in Dewsbury town centre which offers numerous key services, employment opportunities and residential areas. After a review of the local infrastructure, it has been concluded that these facilities can be accessed easily via sustainable means, namely walking, cycling and public transport, particularly utilising Dewsbury Bus Station.*
- The TS has been prepared in accordance with national and local planning policy*
- The maximum capacity of the development will ultimately remain the same in terms the number of buses serving the site and, as a result, the potential maximum number of vehicular movements will remain unchanged*

- *It is anticipated that the proposed development will accommodate 60 buses per hour in the AM and PM peak hours. However, the design will afford for a maximum capacity of up to 120 buses per hour, based on 6-8 buses per hour per stand within the Transport Interchange.*
- *The location of the existing access points for vehicles has been maintained, but the layout has been improved. Consideration has been given to the future development of the South Street and Aldams Road Schemes.*
- *Swept path analysis has been undertaken and has determined that the site can be appropriately accessed by delivery vehicles and buses, with all vehicles entering and exiting the site in forward gear”.*

Section 8.2 of the TS concludes that *“On the basis of the findings within this TS and in the context of para. 111 of the NPPF, it is considered that there are no residual cumulative impacts in terms of highway safety or the operational capacity of the surrounding transport network and therefore planning permission should not be withheld on transport grounds”.*

4.9 Stage 1 Road Safety Audit

A Stage 1 RSA of the proposals was undertaken during the design process to inform the design development and has been submitted with the planning application. Whilst the RSA was used for internal purposes only, a designer’s response is also included for completeness, recording how each of the points raised have been responded to.

4.10 Contaminated Land, Coal Mining, and Minerals

A Desk Study and Coal Mining Risk Assessment was been prepared by WSP in October 2021 (reference: 70077924) for the Scheme.

Details for the Scheme included in WSP’s report have not changed to the degree that impacts described/method statement details are now inaccurate. As such, this report has been relied on for the assessment.

The document advises in Section 8.2 that *“The environmental setting of the site in terms of potential risk from contamination is considered to be low for human health due to the continued use as a bus station and low to moderate for controlled waters due to the presence of a Secondary A aquifer underlying the site”.*

Section 8.3 goes on to state *“Potential sources of contamination have been identified associated with the current and historical site uses. The site has been occupied by mills, warehouses, former residential properties (now demolished), a pond / reservoir (later infilled), a car park and a bus station.*

Risk ratings assigned to the key identified receptors are summarised below:

- *Risks to future site users: Given the surface cover across the majority of the site comprises buildings or hardstanding there is considered to be a low risk posed to future site users in the context of the continued use as a bus station.*
- *Risks to construction and maintenance workers: To support the proposed redevelopment of the site, preparation and enabling works could result in the excavation and movement of small quantities of Made Ground and fill materials which may contain asbestos, heavy metals, PAHs and oil / fuel hydrocarbons. It is considered there is a low to moderate risk to construction and maintenance workers, based on the assumption that excavation will be limited in extent, exposure durations will be limited, that appropriate PPE / RPE will be worn, and clean hygiene practices (e.g. handwashing, housekeeping) will be adopted.*
- *Risks to controlled waters: Risks to controlled waters (underlying Secondary A Aquifers and River Calder) are considered to be low to moderate. Although potential sources of contamination are present on site, the improvement works are unlikely to impact controlled waters receptors. The presence of hardstanding across the site should inhibit the migration of potential contaminants to the underlying aquifers or River Calder.*

The site lies within an area defined to be at low risk from [unexploded ordinance] UXOs”.

Given that potential sources of contamination have been identified in the Desk Study a further report will be prepared following completion of the intrusive ground investigation. It is anticipated that approval of this report by Kirklees Council would be a condition of any consent granted for the Scheme.

4.10.1 Coal Mining

Chapter 5 of the document provides the Preliminary Coal Mining Risk Assessment. Section 5.1 outlines the scope of the assessment and advises that *"the site does not lie within a Coal Authority defined 'Development High Risk Area'. However, two named coal seams are shown to subcrop within the boundary of the site"*.

The summary in Section 5.4 of the document advises that there is no past underground mining recorded within the site, the presence of two coal seam subcrops within the site means that the potential for unrecorded workings cannot be discounted, albeit no evidence of workings are recorded within the historical British Geological Survey boreholes, no mine entries are recorded within 500m of the site, no faults or fissures are recorded within the site, no records of mining gas emissions have been identified, and no surface mining is shown within influencing distance of the site.

The document states *"Based on all the information reviewed for the site (as summarised above), the evidence for or against the potential presence of unrecorded shallow workings beneath the site is considered to be inconclusive. As such, it is considered that the risk of shallow unrecorded workings cannot be discounted and further investigation is considered warranted"*. In terms of the mitigation, it is recommended that intrusive investigation is undertaken to better understand the risks from coal mining, including two cable percussion boreholes with rotary follow on to 30mBGL.

5. Climate Change Considerations

5.1 Introduction

In January 2019, Kirklees Council declared a climate emergency and in November 2019 the council adopted a target for achieving 'net zero' carbon emissions by 2038. The Kirklees Climate Change Action Plan (CCAP) was published in September 2022 and outlines the council's approach for achieving net zero and being climate ready by 2038. The CCAP outlines mitigation and adaptation actions across eight key action sectors, being buildings, energy, natural environment and biodiversity, sustainable food and agricultural, transport, waste, water and cross-cutting. The CCAP will be followed up by a more detailed action plan.

Kirklees Council published Planning Application Climate Change Guidance in June 2021 to outline the requirement for a Climate Change Statement to be submitted as part of all planning applications. Further details about the proposals and the required Climate Change Statement are below.

5.2 Overview of the Proposals for Reducing Carbon

It is recognised that new development and refurbishment projects should be designed to be future-ready, including the mitigation of climate impacts and carbon emissions. Several carbon mitigation measures have been considered for the Scheme to contribute to net-zero throughout the Scheme development and delivery.

Changing climate conditions pose risks to transport networks. In order to deliver resilient and future ready infrastructure, climate risks need to be understood from early stages and adaption embedded in design. The Scheme has the opportunity to set a precedent and to deliver resilient and future ready infrastructure to drive the need for change within the town centre and surrounding areas.

The delivery of the Scheme focusses on safe, efficient delivery within the tight programme constraints. The next phases of design and construction will build on the extensive work already undertaken at the RIBA 3 preliminary design stage, retaining the fundamental nature of the preliminary design but targeting opportunities for real enhancement. The solution supports the carbon reduction objectives, providing value for money, enhancing biodiversity, and assisting WYCA in achieving their net zero carbon ambitions.

The contract is defined to encourage the Contractor to develop a technical proposal to include specific opportunities to help meet carbon reduction targets by adopting PAS 2080:2016 Carbon Management in Infrastructure principles.

The Contractor will be required under the Contract to practice sustainable waste management in accordance with the Waste Regulations 2011, to identify methods to reduce waste and waste to landfill, and to report to the Client the forecast waste and recycled content and to quantify and agree potential waste reductions.

There will be a requirement for the Contractor to develop and implement a SWMP from an early design stage and include the waste forecasts and data on reduction targets and actions. The Contract also requires the Contractor to develop and implement a MMP which will cover the use of materials on the site and set out the quantities and destination of all materials within the works.

The Contractor shall be responsible for providing an indicative carbon footprint of the carbon emissions associated with the delivery of the project. They shall actively manage and reduce the carbon footprint wherever possible and shall include carbon reduction planning in their design, assessment, and appraisal of the works.

Carbon reduction planning covers the proposed changes to the building and external areas, waste management and provision of any offsetting measures. It is anticipated the Contractor will bring together their key supply chain partners to proactively target the three factors of CO₂ – capital carbon, operational carbon and user carbon. In terms of capital carbon, the design stage is where the Contractor can have the biggest impact on the Scheme's embedded carbon. Once the construction is underway many of the opportunities to make savings in materials are lost.

It is expected that the Contractor will focus on reducing required volumes of bulk materials throughout the design process and reducing waste in construction to reduce embedded (capital) carbon of bulk materials,

and investigate the use of sustainable alternative materials such as recycled steel and aggregates, or cement bound granular mixtures instead of conventional asphalt construction.

Section 4.9 of the DAS outlines the general principles for the Scheme which have been adopted for sustainable and environmentally responsible construction.

5.3 Climate Change Statement

A Climate Change Statement for the Scheme is provided in Appendix D and sets out how the Scheme will contribute towards the transition to a low carbon economy, including:

- Details about how the layout has been designed to minimise the consumption of energy
- How the bus station building would be redesigned to reduce energy consumption

6. Planning Policy Review

6.1 Introduction

This chapter identifies relevant national and local planning policies, including the site's policy allocation and any relevant local designations. It also identifies other relevant material considerations. An assessment is provided for the relevant policies and material considerations against the need for the Scheme and its design, and against other relevant environmental considerations.

6.2 National Planning Policy Framework

The NPPF, last updated in July 2021, sets out the government's planning policies for England and how they should be applied. It constitutes guidance for Local Planning Authorities (LPAs) and decision takers both in respect of plan preparation and as a material consideration in determining planning applications; it draws attention to Section 19(2) (a) of the Planning and Compulsory Purchase Act 2004, which requires policy makers to have regard to national policies and advice in guidance issued by the Secretary of State.

Key paragraphs from the NPPF of relevance to the Scheme are set out below.

6.2.1 Chapter 2: Achieving sustainable development

Paragraph 7 of the NPPF advises that *"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, 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"*. Paragraph 8 of the NPPF acknowledges that there are three overarching objectives for achieving sustainable development, being an economic, social, and environmental objectives.

The Scheme comprises the transformation of Dewsbury Bus Station. It will improve the existing environment through the upgrades to the building and increasing the amount of landscaping on the site. It will also provide several public benefits through the provision of improved public transport infrastructure and facilities.

The Scheme seeks to prioritise the use of sustainable modes of transport, i.e. bus, and reduce reliance on the private car. Therefore, it is considered to enable a sustainable pattern of development.

6.2.2 Chapter 4: Decision-making

Chapter 4 of the NPPF provides guidance for pre-application engagement. It recognises that early engagement has the potential to improve the efficiency and effectiveness of the planning application system, and that the more issues that can be resolved at the pre-application stage, the greater the benefits.

Paragraph 47 of the NPPF reiterates the importance of the local development plan when dealing with planning applications, whilst highlighting that other considerations may affect the determination. It states *"Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise"*.

As noted in Section 1.1.1 and 6.4.1.1 of this report, pre-application consultation has taken place for the Scheme. The Kirklees Local Plan (KLP) was adopted in 2019 and as detailed below, the Scheme is in general accordance with the development plan and there are no material considerations that indicate that planning permission should not be granted.

6.2.3 Chapter 6: Building a strong, competitive economy

Chapter 6 of the NPPF seeks to build a strong and competitive economy and advises in paragraph 81 that *"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future"*.

Further, paragraph 83 of the NPPF states *“Planning policies and decisions should recognise and address the specific locational requirements of different sectors”*.

As noted in Section 1.1, the Scheme seeks to better connect people through affordable and sustainable transport measures, and aims to improve access to the bus station and refurbish the internal building to a higher standard. Further, the Scheme will contribute to the wider ambitions for Dewsbury as a town, enabling the town centre to strengthen and sustain its economic role within the region, contributing to the delivery of the LCR's vision for 'good growth'.

6.2.4 Chapter 7: Ensuring the vitality of town centres

Chapter 7 of the NPPF advises that *“Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation”*.

The plans for the bus station are transformational and aspire to integrate how people in Dewsbury and West Yorkshire access different places through using buses, trains, walking and cycling. WYCA's aspiration is to provide a 21st century bus station with modern and contemporary facilities to provide the best experience for passengers travelling to, from and around Dewsbury, making the bus station building a place that people want to use and visit.

The Scheme will be located on the same site as the existing bus station facility, which is on the edge of the town centre boundary. The existing bus station was built nearly 30 years ago and is at the end of its design life, with the facility posing a significant maintenance burden. As previously noted, the Scheme will contribute to the wider ambitions for Dewsbury as a town, enabling the town centre to strengthen and sustain its economic role within the region, contributing to the delivery of the LCR's vision for 'good growth'.

6.2.5 Chapter 8: Promoting healthy and safe communities

Chapter 8 of the NPPF relates to providing healthy, inclusive and safe places. The section provides a number of ways in which a development can help to promote healthy environments. Paragraph 92b of the NPPF advises that this includes places that *“are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of attractive, well-designed, clear and legible pedestrian and cycle routes, and high quality public space, which encourage the active and continual use of public areas”*.

Paragraph 93d of the NPPF advises that in order to provide facilities and services the community needs, decisions should *“ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community”*.

The design of the Scheme has taken account of a number of factors in regard to safety as detailed in the DAS. In particular, Section 4.8.2 of the DAS provides the current general approach to security, including:

- *“Provision of excellent natural sight lines throughout and around the bus station, supported by CCTV coverage.*
- *Provision of new soft landscaping which is designed to avoid concealment, along with defensible planting to help deter unauthorised access across the bus runways.*
- *Re-design of the retail units to provide the potential for improved natural surveillance of the adjacent public space.*
- *Increased levels of natural light within the building and improvements in the uniformity, coverage and colour rendering index of the building and site artificial lighting.*
- *Reconfiguration of the Security and Bus Station Manager's Offices to provide more flexibility for security patrols of the concourse without the office being left unmanned.*
- *Provision of a new customer information desk which offers the potential for further staff supervision of the passenger concourse.*
- *Provision of emergency help points within the passenger concourse.*

- *Flexibility in lockdown and opening of the bus station entrance doors via a remote door locking system, to restrict access or to facilitate emergency evacuation in the event of a security or terrorist threat.*
- *Visual 'opening up' of the Aldams Road wall to provide better natural sight lines into and out of the bus station site for security.*
- *Specification of robust materials, including upgraded glazing systems, claddings and fixtures and fittings".*

The Scheme provides links to existing pedestrian routes in the area. Further, cycle parking facilities will be provided at each of the main building entrances.

6.2.6 Chapter 9: Promoting sustainable transport

Chapter 9 of the NPPF advises that transport issues should be considered from the earliest stages of development proposals, so that:

- a) *The potential impacts of development on transport networks can be addressed;*
- b) *Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) *Opportunities to promote walking, cycling and public transport use are identified and pursued;*
- d) *The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) *Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places".*

A review of existing policy and strategy documents has been undertaken in the TS to assist in the identification of the current conditions in the Dewsbury Study Area. Further, information provided regarding the design of the Scheme in the DAS demonstrates that the relevant criteria listed in Section 9 of the NPPF have been addressed.

6.2.7 Chapter 11: Making effective use of land

Paragraph 119 of the NPPF seeks to promote an effective use of land while safeguarding and improving the environment and ensuring safe and healthy living conditions. It advocates for the use of brownfield land.

The Scheme is of a high quality design and will be located on the same site as the existing bus station facility. As such, it meets the requirements of Section 11 of the NPPF.

6.2.8 Chapter 12: Achieving well-designed places

Paragraph 126 of the NPPF states *"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".* It also advocates for effective engagement between applicants, communities, local planning authorities and other interests throughout the process.

The Scheme provides a visually attractive architecturally designed building, with a well-considered layout and provision of appropriate landscaping. The development is near the Dewsbury Town Centre Conservation Area and Grade II* listed buildings (as detailed in Section 4.3 of this report) and has been designed to be in keeping with existing development in the area through the use of materials, an appropriate colour palette, and landscaping, as detailed in the DAS.

It is not possible to retain the existing trees on the site; however, replacement planting is proposed which is appropriate to the location and nature of the development.

As per the requirements of paragraph 132 of the NPPF, design quality has been considered throughout the evolution of the Scheme and discussions have taken place with Kirklees Council and key stakeholders/statutory consultees.

The Scheme incorporates sustainable features such as a green roof and PV panels. Details about the form and layout of the proposals are included in the DAS.

6.2.9 Chapter 14: Meeting the challenge of climate change, flooding and coastal change

Chapter 14 of the NPPF advises that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It also sets out when SuDS are required for a development.

As previously mentioned, the site is predominantly located within Flood Zone 1 and the southern portion of the site is within Flood Zone 2. A FRA has been prepared for the Scheme, which identified that there is an existing flood risk to a part of the site from fluvial, surface water and groundwater flooding; however, there should be no significant increase in flood risk due to the development. Further, there will be a reduction to the impermeable area through incorporation of new landscaped areas which may contribute to improved interception of more frequently occurring rainfall events.

The FRA confirms that there is limited opportunity to provide new SuDS; however, as the Scheme includes for a reduction in the impermeable area of the site through provision of new landscaped areas, it is expected that this increase in landscape areas will increase interception of water on the site and reduce the total run-off from the site.

6.2.10 Chapter 15: Conserving and enhancing the natural environment

Chapter 15 of the NPPF sets out the principles and requirements to protect and enhance the natural and local environment. Paragraph 174 seeks to conserve and enhance the natural and local environment, by:

"d) Minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures".

Paragraph 180 of the NPPF seeks to conserve and enhance biodiversity. It advocates for a net gain for biodiversity.

The Scheme will reduce the amount of hardstanding on the site and will increase the amount of landscaping. The proposed landscaping throughout the site is contextually responsive to the existing planting used in the town centre and will enhance biodiversity on the site. The landscape design will achieve a net gain for biodiversity as detailed in the Biodiversity Net Gain Report.

In terms of ground contamination, paragraph 183 of the NPPF advises that sites should be suitable for their proposed use and that adequate site investigations should be undertaken to inform assessments.

As detailed in Section 4.10 of this report, a Desk Study and Coal Mining Risk Assessment has been prepared for the Scheme, which reviews land contamination and geotechnical risks and constraints associated with the Scheme. The report concludes that a ground investigation is required to determine the extent and nature of potential contamination on site with respect to human health and property receptors. It will also be used to confirm that the surmised risk to controlled waters (surface and groundwater) is low. The report also recommends that an intrusive investigation is carried out prior to development of the land given the lack of existing information on ground conditions at the site.

Paragraph 185 of the NPPF seeks to provide development that is appropriate to its location. This includes reducing the impacts of noise and limiting the impacts of light pollution.

As previously noted, the Scheme is in the same location as the existing bus station facility. The refurbishment of the bus station is unlikely to significantly and/or detrimentally increase the existing levels of noise pollution from/around the site during operation. Noise during construction will be mitigated through measures included in the CEMP.

Lighting for the Scheme will be designed and erected, where practical, to minimise the impact on wildlife and to avoid directing light into environmentally sensitive areas.

In terms of air quality, paragraph 186 of the NPPF advises that opportunities to improve air quality or mitigate impacts should be identified.

The site lies outside of the nearby Air Quality Management Area; however, it is accessed from Aldams Road, which is a road of concern in terms of air quality management. There would not be a significant change in levels of traffic using the site resulting from the proposal as detailed in the TS; therefore, significant detrimental effects on air quality from the Scheme would be unlikely.

6.2.11 Chapter 16: Conserving and enhancing the historic environment

Chapter 16 of the NPPF is in regard to conserving and enhancing the historic environment. Paragraph 194 of the NPPF confirms that, in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting and provides guidance for the level of detail required. Further, paragraph 197. c) of the NPPF advises that LPAs should take account of *“the desirability of new development making a positive contribution to local character and distinctiveness”*.

A Heritage Statement is provided in Section 4.3 of this report. There is a potential for buried archaeology within the site; however, construction of the Scheme will not disturb grounds that would not already have been disturbed by the construction and modifications of the existing bus station in 1994. The majority of works is above ground and deals with the resurfacing of existing hardstanding, new facades, roofs and canopies on the bus station building and an internal refresh of services and decoration. There is no expansion of majority constructions outside of the existing buildings footprint. As such, the likelihood of buried archaeology being unearthed during construction is very low.

6.3 Local Planning Policy

The KLP was adopted in February 2019 and covers the period 2013 – 2031. It comprises the strategy and policies document, allocations and designations document and associated policies map. A review of the KLP is provided below.

6.3.1 Kirklees Local Plan

A review of the KLP Policies Map has been undertaken, which identifies the following allocations/designations for the site:

- Strategic Green Infrastructure Network Ext – River Calder Corridor
- Biodiversity Opportunity Zones – Built-up Areas, Flood Plains
- Mineral Safeguarding - Sand and Gravel with Sandstone and SCR
- Town Centre Boundaries - Dewsbury Town Centre
- TS5 Growth Zone - Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone

The key parts of the policies from the KLP that are pertinent to the Scheme are set out and the proposals have been appraised against them below:

Policy LP1 - Presumption in favour of sustainable development

Policy LP1 of the KLP reflects the presumption in favour of sustainable development outlined in the NPPF. It states *“The council will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”*. Further, *“Proposals that accord with the policies in the Kirklees Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise”*.

See comments for Chapters 2 and 4 of the NPPF (Sections 6.2.1 and 6.2.2 of this report). The Scheme is in accordance with Policy LP1.

Policy LP2 - Place shaping

Policy LP2 of the KLP advises that development proposals should seek to build on the strengths, opportunities and help address challenges identified in the KLP, in order to protect and enhance the qualities which contribute to the character of these places. The statement for place shaping for Dewsbury and Mirfield sets out strengths and opportunities for growth, and challenges to growth.

The Scheme is part of a wider package to transform the way people travel in and around the town, including better walking and cycling access between the bus station and the town centre. The aim for the Scheme (outlined in Chapter 1 of this report) is in line with this policy and will address the relevant challenges to growth identified in the policy, including encouraging more people to use the bus station, helping to regenerate Dewsbury town centre, and improving environmental quality in the area.

As such, it is considered that the Scheme will meet the requirements of this policy.

Policy LP3 - Location of new development

Policy LP3 of the KLP requires development proposals to reflect the Spatial Development Strategy, Policy LP1 and Policy LP2.

The Scheme involves the transformation of the existing Dewsbury Bus Station. As such, it is in conformity with this policy.

LP4 – Providing infrastructure

Policy LP4 of the KLP seeks to provide essential and desirable infrastructure that is required in order to deliver the spatial strategy as set out in the KLP.

The Scheme will improve the existing bus station in Dewsbury and will enhance the public realm. Existing infrastructure services the site and has been assessed during the design process. It is anticipated that there will be no additional demand on services.

Policy LP7 - Efficient and effective use of land and buildings

Policy LP7 of the KLP advises that proposals *“should encourage the efficient use of previously developed land in sustainable locations provided that it is not of high environmental value”*.

The Scheme involves the redevelopment of the existing bus station and is therefore in accordance with this policy.

Policy LP13 – Town centre uses

Policy LP13 of the KLP requires main town centre to be located within defined centres. It states *“All proposals shall be inclusive for all users, and be attractive to pedestrians, cyclists, and public transport users. They shall also conserve and enhance the local character, heritage, green spaces and the public realm where appropriate”*.

The Scheme involves the transformation of Dewsbury Bus Station, including the re-configuration of the existing retail units to rationalise the retail offer and improve accessibility around the bus station entrances. One of the aims of the Scheme is to help regenerate Dewsbury town centre in line with the Dewsbury Blueprint (see Section 6.4.2 of this report). It has been designed to be inclusive for all users through the provision of natural wayfinding and provision of accessible design features to permit access for all users. Further, the design has taken account of heritage assets and green infrastructure within the area.

As such, it is considered that the Scheme meets the requirements of Policy LP13.

Policy LP14 - Shopping frontages

Policy LP14 of the KLP advises that within Principal and Town Centres, Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages have been defined to ensure a strong retail core to these centres, and focus main town centres uses within defined areas. In regard to Secondary Frontages, the

policy advises that these are “frontages within and adjacent to the Primary Shopping Area in Principal and Town Centres that are not designated as Primary Shopping Frontages. These frontages are characterised by a mix of retail and other ‘main town centre uses’”.

The north western corner of the site is subject to the Secondary Shopping Frontages designation. The retail units within the bus station building area do not front the northern elevation of the bus station.

The Scheme involves an improved exterior of the building, thereby helping to regenerate Dewsbury town centre.

Policy LP16 - Food and drink uses and the evening economy

Policy LP16 of the KLP advises that proposals for food and drink, licensed entertainment uses and associated proposals will be supported, provided they are located within a defined centre, and subject to “ensuring the concentration of food and drink and licensed entertainment uses are not located in a particular centre or part of a centre, where they would result in harm to the character, function, vitality and viability of the centre, either individually or cumulatively”.

An existing café is located within the bus station. The café will be reconfigured and improved as part of the proposals.

Policy LP18 - Dewsbury town centre

Policy LP18 of the KLP states “Dewsbury Town Centre will be a place of vibrancy, vitality and diversity, with a mix of uses to attract visitors and provide new space for town centre living. The town centre will form the focus for retail provision for the north of the district, supported by other main town centres uses”. The policy also advocates for proposal to provide appropriate connections and enhancements to convenient pedestrian and cycling routes.

See comments for Policy LP2.

Policy LP19 - Strategic transport infrastructure

Policy LP19 of the KLP recognises the strategic position of Kirklees in relation to the Leeds, Sheffield and Manchester City regions. It states “The aim is to achieve a balanced and integrated transport network which makes the most efficient and effective use of road, rail and public transport”.

It also advises that proposals that may prejudice the future development of strategic transport schemes will not be permitted. Further, it also requires detailed transport schemes to have regard to the constraints and considerations as set out in the KLP i.e. impacts on designated heritage assets and any other environmental impacts.

The Scheme is in accordance with this policy as it involves the refurbishment of the existing Dewsbury Bus Station. Details for the design are included in the DAS. Existing and planned transport projects have been taken into consideration during the design process as detailed in the TS and DAS.

Policy LP20 - Sustainable travel

Policy LP20 of the KLP 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 Scheme is wholly consistent with this policy as involves improvements to the existing bus station facility.

Policy LP21 - Highways and access

Policy LP21 of the KLP states “Proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users”. It also states “Proposals shall demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals shall also consider any impacts on the Strategic Road Network”. The policy sets out a number of criteria for proposals.

The location of existing accesses to the site will not change as a result of the proposals. The TS provides further information for the Scheme to meet the requirements of this policy.

Policy LP22 – Parking

Policy LP22 sets out the principles for the provision of parking. It states *“All proposals shall provide full details of the design and levels of proposed parking provision. They should demonstrate how the design and amount of parking proposed is the most efficient use of land within the development as part of encouraging sustainable travel”*.

No public parking is provided on the site. The Scheme would remove 14 staff/visitor car parking spaces from the site which were previously reserved for the owners/workers of the retail units. However, two contractor vehicle parking spaces would be retained at the south of the site, with provision for EV charging. No visitor/staff car parking would be retained on-site. Further information is provided in the TS and DAS.

Policy LP24 – Design

Policy LP24 of the KLP is in regard to good design and advises that this should be considered at the outset of the development process, including high quality, green, accessible, inclusive and safe design, where applicable. The policy sets out several criteria for proposals to promote good design.

See comments for Policy LP2. Further, the DAS outlines the evolution of the design and how the Scheme caters for all users.

Policy LP25 – Advertisements and shop fronts

Policy LP25 sets out criteria for the development of new or replacement shop front units and display of advertisements.

The retail units are currently located within the bus station building and this will not change as a result of the Scheme. The design is consistent with the character of the existing building in terms of scale, quality and use of materials.

New glazed screens and automatic doors are provided to the internal mall frontage of the retail units to help improve the internal aesthetics of the mall and to provide assisted access for mobility impaired users.

The retail units are provided as shell only, with pop-ups for electric, water and drainage to permit individual tenant fit out.

Possible signage zones have been assigned to the shopfronts and to the main retail unit façade; however, the design and location of any signage would be subject to a further planning application by the individual tenant.

Policy LP27 – Flood risk

Policy LP27 of the KLP sets out the requirements for a sequential test and exception test for development.

The application site is located within an area at low risk of flooding. A FRA has been prepared for the Scheme as detailed in Section 4.1 of this report. A sequential test and exception test were not required for the Scheme.

Policy LP28 – Drainage

Policy LP28 of the KLP advises that the presumption is that SuDS will be used to assist in achieving the following:

- “b. For proposals on brownfield sites there should be a minimum 30% reduction in surface water run-off where previous positive surface water connections from the site can be proven. New connections will be subject to at least greenfield restrictions;*
- c. No negative impact on local water quality and improvements in water quality where practicable;*
- d. Consider whether proposed open spaces and green infrastructure within sites can contribute to the sustainable drainage of the site”.*

The policy goes on to provide further advice for drainage proposals. It also states *“Development will only be permitted if it can be demonstrated that the water supply and waste water infrastructure required is available or can be co-ordinated to meet the demand generated by the new development”*.

Information regarding drainage is provided in Section 4.2 of this report. As previously noted, the FRA confirms that there is limited opportunity to provide new SuDS; however, as the Scheme includes for a reduction in the impermeable area of the site through provision of new landscaped areas, it is expected that this increase in landscape areas will increase interception of water on the site and reduce the total run-off from the site.

Policy LP30 - Biodiversity and Geodiversity

Policy LP30 of the KLP advises that *“The council will seek 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 Principal Importance and the Kirklees Wildlife Habitat Network”*.

The Scheme involves a reduction in the amount of hardstanding on the site and an increase in the amount of landscaping. Assessments for ecology have been undertaken for the Scheme, as detailed in Section 4.4 and 4.5 of this report. The recommendations of these reports have been taken account of in the design of the Scheme, and mitigation measures will be included in the CEMP.

As previously noted, a Biodiversity Net Gain Report has been prepared for the Scheme, which advises that the Scheme will achieve a net gain of 2.20 habitat units (395.05%) and will generate an additional 0.13 hedgerow units.

Policy LP31 - Strategic Green Infrastructure Network

Policy LP31 of the KLP seeks to safeguard and enhance green infrastructure networks, green infrastructure assets and the range of functions they provide. It states *“Development proposals within and adjacent to the Strategic Green Infrastructure Network should ensure:-*

- (i) The function and connectivity of green infrastructure networks and assets are retained or replaced;*
- (ii) New or enhanced green infrastructure is designed and integrated into the development scheme where appropriate, including natural greenspace, woodland and street trees;*
- (iii) 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;*
- (iv) The protection and enhancement of biodiversity and ecological links, particularly within and connecting to the Kirklees Wildlife Habitat Network.*

The council will support proposals for the creation of new or enhanced green infrastructure provided these do not conflict with other Local Plan policies”.

The Scheme proposes an increase in the amount of landscaping on the site. Appropriate plant species have been recommended, taking account of existing landscaping on the site and landscaping within the wider area.

Policy LP32 - Landscape

Policy LP32 of the KLP advises that proposals should be designed to take into account and seek to enhance the landscape character of the area. The following are relevant for the Scheme:

- “b. The setting of settlements and buildings within the landscape;*
- d. The appearance of rivers, canals, reservoirs and other water features within the landscape”.*

See comments for Policy LP31. Details for landscaping are provided in Section 3.6 of this report and in the DAS.

Policy LP33 - Trees

Policy LP33 of the KLP seeks to retain existing trees and advises that *“Proposals will need to comply with relevant national standards regarding the protection of trees in relation to design, demolition and*

construction. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme”.

As detailed in Section 4.6 of this report, the Scheme requires the removal of five existing trees on the site. The landscaping proposals include an increase in landscaped areas on the site, including 14 replacement trees. Measures will also be in place to protect trees that will be retained on the site. As such, it is considered that the Scheme will meet the requirements of this policy.

Policy LP34 - Conserving and enhancing the water environment

Policy LP34 of the KLP sets out the requirements that proposals must meet, including protecting water from contamination, disposing of surface water appropriately, managing water demand and improving water efficiency, and improving water quality through the use of SuDS and surface water management techniques taking into account the sensitivity of groundwater.

Surface water will continue to be disposed of via the mains system; however, as the amount of landscaped areas would increase on the site, the amount of surface water discharged from hardstanding areas should reduce. Further, water saving devices (including taps, dishwashers, toilets, and showers) will be used for the Scheme.

The Desk Study for contamination reviews potential sources of contamination for water. Further investigations prior to construction commencing on the site.

Policy LP35 - Historic environment

Policy LP35 of the KLP sets out the requirements for proposals in regard to designated and non-designated heritage assets.

A Heritage Statement is provided in Section 4.3 of this report. The design has taken account of heritage assets in the area, as detailed in the DAS.

Policy LP38 - Minerals safeguarding

Policy LP38 of the KLP restricts surface development within a MSA. It advises that the policy does not apply to extensions to existing buildings and the erection of ancillary buildings within their curtilages.

Policy LP43 - Waste management hierarchy

Policy LP43 of the KLP advises that *“The council will encourage and support the minimisation of waste production, and support the re-use and recovery of waste materials including, for example, recycling, composting and Energy from Waste recovery”.*

Provision for the separation of waste will be incorporated within the Scheme. As noted earlier, there will be a requirement for the Contractor to develop and implement a SWMP from an early design stage and include the waste forecasts and data on reduction targets and actions. As such, the Scheme will meet the requirement of this policy.

Policy LP47 - Healthy, active and safe lifestyles

Policy LP47 of the KLP sets out a number of measures to create an environment which supports healthy, active and safe communities and reduces inequality. This includes:

- “e. Increasing opportunities for walking, cycling and encouraging more sustainable travel choices*
- f. Supporting energy efficient design and location of development*
- g. Ensuring that the current air quality in the district is monitored and maintained and, where required, appropriate mitigation measures included as part of new development proposals*
- h. Creating high-quality and inclusive environments incorporating active design and the creation of safe, accessible and green environments which minimise and mitigate against potential harm from risks such as pollution and other environmental hazards”.*

See comments for Chapter 8 of the NPPF. The Scheme will meet the requirements of this policy.

Policy LP51 - Protection and improvement of local air quality

Policy LP51 of the KLP advises 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”*.

As noted in Section 4.8 of this report, there would not be a significant change in levels of traffic using the site resulting from the proposal as detailed in the TS; therefore, significant detrimental effects on air quality from the Scheme would be unlikely.

Policy LP52 - Protection and improvement of environmental quality

Policy LP52 of the KLP requires planning applications for proposals which may increase pollution to be accompanied by evidence to show that the impacts have been evaluated and measures have been incorporated to prevent or reduce the pollution, so as to ensure it does not reduce the quality of life and well-being of people to an unacceptable level or have unacceptable impacts on the environment.

The Scheme will transform the existing bus station and will improve the existing environment in the area. Where impacts have been identified, measures have been incorporated into the design to avoid or reduce impacts, where possible. Further, the CEMP for the Scheme will outline the requirements for construction of the Scheme.

Policy LP53 - Contaminated and unstable land

Policy LP52 of the KLP deals with development on land that is unstable, currently contaminated or suspected of being contaminated, or will potentially become contaminated as a result of the development.

As per the requirements of the policy, a Desk Study covering contamination has been prepared for the Scheme, which advises that the potential risk from contamination is considered to be low for human health due to the continued use as a bus station and low to moderate for controlled waters due to the presence of a Secondary A aquifer underlying the site. Potential sources of contamination have been identified in the Desk Study; therefore, a further report will be prepared following completion of the intrusive ground investigation. It is anticipated that approval of this report by Kirklees Council would be a condition of any consent granted for the Scheme.

6.4 Other Material Considerations

6.4.1 National Planning Practice Guidance

In March 2014, the Ministry of Housing, Communities and Local Government (formerly the Department for Communities and Local Government) launched a National Planning Policy Guidance (NPPG) web-based resource. The following guidance is relevant for the Scheme:

6.4.1.1 Before Submitting an Application

This guidance was revised in 2019 and provides an overview of the value of pre-application engagement. It recognises that the approach to pre-application engagement needs to be tailored to the nature of the proposed development and the issues to be addressed, with the main parties generally involving the applicant, the LPA, statutory and non-statutory consultees, elected members and local people.

The Applicant recognises the importance of pre-application engagement and has undertaken engagement with the LPA, statutory and non-statutory consultees, and bus operators throughout the design process. Further details are provided in Section 1.1.1 of this report.

Pre-application consultation has also been undertaken with local businesses and the public. Further information regarding previous consultation events and current events is provided on WYCA's website - <https://www.yourvoice.westyorks-ca.gov.uk/dewsbury>.

6.4.1.2 Climate Change

This guidance was revised in 2019 and advises on mitigation and adaptation measures to address the impacts of climate change. An example of how climate change can be mitigated is reducing the need to travel and providing for sustainable transport, as well as providing renewable and low carbon energy technologies.

The Scheme has been designed to take climate change into account, as detailed in Chapter 5 of this report.

6.4.1.3 Design: Process and Tools

This guidance was revised in 2019 and sets out information for planning well-designed places. It states *“Good design is set out in the National Design Guide under the following 10 characteristics: context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources, and lifespan”*.

Information regarding the design of the Scheme is set out in Chapter 3 of this report and the DAS.

6.4.1.4 Flood Risk and Coastal Change

The flood risk and climate change sections of the NPPG were revised in August 2022. They provide guidance on how to take account of and address the risks associated with flooding and coastal change in the planning process.

As noted above, the NPPF sets out strict tests in relation to protecting people and property from flooding, being the sequential test and the exception test. The flood risk and climate change sections of the NPPG set out the main steps to be followed in addressing flood risk. It states *“The steps are designed to ensure that if there are lower risk sites available, or a proposed development cannot be made safe throughout its lifetime without increasing flood risk elsewhere, it should not be permitted. Measures to avoid, control, manage and mitigate flood risk should also not increase flood risk elsewhere”*.

The design of the Scheme has considered the risk of flooding. Further details are provided in Section 4.1 of this report.

6.4.1.5 Healthy and Safe Communities

This guidance was revised in 2022 and states *“The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population)”*. In terms of good design, the guidance states *“Good design that considers security as an intrinsic part of a masterplan or individual development can help achieve places that are safe as well as attractive, which function well, and which do not need subsequent work to achieve or improve resilience. However good security is not only about physical measures and design; it requires risks and mitigation to be considered in a holistic way”*.

The provision of a high quality, inclusive design was a key consideration for the Scheme. Further details are provided in the DAS.

6.4.1.6 Historic Environment

This guidance was revised in 2019 and provides information for enhancing and conserving the historic environment. It states *“Conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in every day use and as yet undiscovered, undesignated buried remains of archaeological interest”*.

The design of the Scheme has considered heritage assets in the area. Further details are provided in Section 4.3 of this report.

6.4.1.7 Land Affected by Contamination

This guidance was revised in 2019 and provides guiding principles on how planning can deal with land affected by contamination. The guidance advises that the role of planning when dealing with land that may be contaminated is *"To ensure a site is suitable for its new use and to prevent unacceptable risk from pollution, the implications of contamination for development should be considered through the planning process to the extent that it is not addressed by other regimes"*.

Sources of contamination have been considered for the Scheme and a Desk Study has been prepared. An overview of this report is detailed in Section 4.10 of this report.

6.4.1.8 Light Pollution

This guidance was revised in 2019 and sets out the light pollution considerations that planning needs to address. It states *"Artificial lighting needs to be considered when a development may increase levels of lighting, or would be sensitive to prevailing levels of artificial lighting. Artificial light provides valuable benefits to society, including through extending opportunities for sport and recreation, and can be essential to a new development. However, for maximum benefit, it is important to get the right light, in the right place and for it to be used at the right time"*.

The lighting proposals for the Scheme have been prepared in line with this guidance. Further details are provided in Section 3.5 of this report.

6.4.1.9 Natural Environment

This guidance was revised in 2019 and identifies key issues in implementing policy to protect and enhance the natural environment, including local requirements. The guidance provides information on net gain and how it can be achieved.

An Ecological Constraints Assessment and Biodiversity Net Gain Report have been prepared for the Scheme in line with this guidance. An overview of these reports are detailed in Section 4.4 of this report.

6.4.1.10 Travel Plans, Transport Assessments and Statements

This guidance was published in 2014 and provides information regarding the contents of Travel Plans, Transport Assessments and Statements, which are required for all developments which generate significant amounts of movements. In regard, to Transport Assessments and Statements, the guidance advises that the need for, scale, scope and level of detail required of a Transport Assessment or Statement should be established as early in the development management process as possible as this may therefore positively influence the overall nature or the detailed design of the development.

A TS has been prepared for the Scheme in line with this guidance. An overview of this report is detailed in Section 4.8 of this report. A Travel Plan is not required for the Scheme.

6.4.1.11 Waste

This guidance was published in 2015. In terms of new development, the guidance seeks to integrate local waste management opportunities into these developments. It sets out the waste hierarchy, which applies as a priority order in waste prevention and management legislation and policy: a. prevention; b. preparing for re-use; c. recycling; d. other recovery, e.g. energy recovery; and e. disposal.

The construction of the Scheme will reuse materials onsite where appropriate and a SWMP will be in place during the construction works. In addition, provision will be made for the separate disposal of refuse and recyclable materials on the site.

6.4.1.12 Water Supply, Wastewater and Water Quality

This guidance was revised in 2019 and provides information for water supply, wastewater and water quality considerations for planning applications.

The supply of potable water and disposal of wastewater was assessed during the design of the Scheme. Further details for the proposals are provided in Section 4.2 of this report and in the DAS.

6.4.2 Dewsbury Blueprint

The Dewsbury Blueprint¹ is a 10-year plan that seeks to honour the heritage of Dewsbury and build on recent investments. The Blueprint advises that it aims to bring more activity into the town centre, make it more attractive and improve accessibility.

One of the key projects as part of the Dewsbury Blueprint is the Dewsbury town centre, Strategic Development Framework (SDF) detailed below.

6.4.3 Dewsbury town centre, Strategic Development Framework 2018 & Delivery Programme

The Dewsbury town centre, SDF 2018 builds on the SDF produced in 2010 and sets out a 25 year vision for the town centre, supported by a delivery programme that includes projects and actions over the five year period from 2018 to 2023. The document mentions the future revival of Dewsbury town centre, with the vision being:

"To have a thriving living town, tapping into the potential of its people, and maximising its role as a key transport and economic location".

The SDF 2018 is based on three aims, being:

- Aim 1 - Increasing activity: this aim seeks to bring more activity into the centre, including introducing new uses
- Aim 2 - Improving attractiveness: this aim is in regard to the town being somewhere attractive and pleasant to be in
- Aim 3 - Improving accessibility: this aim advises that the town centre needs to be accessible and to achieve this it proposed to have an integrated approach to sustainable transport in the town, including transport infrastructure that supports the viability of the town centre. A key project identified is improvements to bus services and facilities.

The Scheme has TCF funding and will contribute to the TCF vision and objectives, in terms of better connecting people through affordable and sustainable transport measures. The Scheme aims to improve access to the bus station and refurbish the internal building to a higher standard, as well as offer opportunities to improve energy efficiency on site. It will also contribute to the wider ambitions for Dewsbury as a town, enabling the town centre to strengthen and sustain its economic role within the region, contributing to the delivery of the LCR's vision for 'good growth'.

6.4.4 Kirklees Highway Design Guide

The Kirklees Highway Design Guide is a Supplementary Planning Document (SPD) was adopted in November 2019 and encourages applicants to deliver good highway design and contribute to the creation of attractive, high quality and sustainable places within the Kirklees district. It outlines highway design principles and sets out information for the design of schemes, and for the preparation of a DAS.

The Scheme has been designed in line with the SPD, and has been taken into account for the preparation of the TS and DAS.

6.4.5 Biodiversity Net Gain Technical Advice Note

Kirklees Council's Technical Advice Note on Biodiversity Net Gain was approved in 2021 and provides information on how to achieve biodiversity net gain through development within Kirklees. This includes the

¹ <https://www.kirklees.gov.uk/beta/dewsbury-blueprint/index.aspx>

Planning Statement

utilisation of Defra's Biodiversity metric to demonstrate a 10% net gain in biodiversity which is due to be mandated by the Environment Bill.

The Biodiversity Net Gain Report for the Scheme has been prepared in line with this technical advice note.

7. Conclusions

This Planning Statement supports the planning application submitted to Kirklees Council for the transformation of Dewsbury Bus Station in Dewsbury, Kirklees. The Scheme forms part of a wider range of regeneration projects in Dewsbury, and the wider LCR, and will support economic growth in the area.

There is a clear and strong focus on achieving sustainable growth at the heart of national planning policy. The improvement of existing sustainable transport infrastructure is a key driver in delivering economic reform and vitality of the Dewsbury economy. Although there is no site specific allocation in the CDP, local planning policy nevertheless clearly supports the redevelopment of the bus station facility on the existing bus station site.

During the design process, careful consideration has been given to the urban nature of the site and its surroundings, including the nearby Dewsbury Town Conservation Area and several Grade II* listed buildings, including Dewsbury Minster. The Scheme has been designed to enhance the landscape and surrounding areas, for example, through the use of appropriate materials and a similar colour palette to existing development in the area, and through increasing the amount of landscaping on the site, achieving an approximate 300% biodiversity net gain for the site.

Overall, planning policy supports the redevelopment of Dewsbury Bus Station and there are no material planning considerations that indicate planning permission should not be granted for the Scheme.

Appendix A. Kirklees Council's Pre-application Advice

Enquiries to: Richard Riggs

Kirklees Direct
Tel: 01484 414746
Email: richard.riggs@kirklees.gov.uk

Peter Matthews
Jefferson Sheard Architects
Rhodesia House
52 Princess Street
Manchester
M1 6JX

Date: 19 January 2023
Our Ref: 2022/21438

Dear Peter

Pre-application enquiry: Dewsbury Bus Station, Aldams Road, Dewsbury, WF12 8AR

The pre-application submission seeks advice on the refurbishment of and improvements to Dewsbury Bus Station. A separate Environmental Impact Assessment (EIA) Screening Opinion was issued for the same proposal on 03/01/2023. This concluded that an Environmental Statement is not required for this proposal.

Policy Context and Land Use

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 27/02/2019).

The site is unallocated in the Kirklees Local Plan.

The site is identified as having the following constraints:

- Dewsbury East Ward
- Within Defined Dewsbury Town Centre Boundary
- TS5 Growth Zone (Mirfield to Dewsbury to Leeds and North Kirklees Growth Zone)
- Close to Primary Shopping Area (north east of site)
- Site contains and is adjacent to Secondary Shopping Frontages
- Close to Dewsbury Town Centre Conservation Area (north of site)
- In the vicinity of Grade II* and Grade II Listed Buildings
- Close to Unlisted Asset of Community Value (The Old Turk (north west of site))
- A-Roads (A638)
- Close to Identified Junction Improvement Areas
- Close to Public Rights of Way
- Close to National Cycle Network Route 69

- In Vicinity of Transpennine Route Upgrade; Huddersfield to Westtown (Dewsbury) Improvement Scheme
- Adjacent to Existing and Proposed Core Walking and Cycling Network
- Coal Advice Area (Development Low Risk Area)
- Potentially Contaminated Land
- Minerals Safeguarding Areas
- Site partially within Flood Zones 1 and 2
- River Calder Corridor Strategic Green Infrastructure Network
- Biodiversity Opportunity Zones
- Close to Wildlife Habitat Networks (Wetland)
- Bat Alert Area
- Swift (*Apus apus*) Nesting Records
- Denby Grange Colliery Ponds Site of Special Scientific Interest Impact Risk Zone

The site is identified as having the following relevant planning history:

<i>Application:</i>	2010/93440
<i>Description:</i>	Change of use of Unit 3 located at Dewsbury Bus Station from Class A1 to Class A3. (Retrospective)
<i>Decision:</i>	Approved 02/02/2011
<i>Application:</i>	1999/90367
<i>Description:</i>	Change of use of part of ground floor to Class A3 (food and drink) and formation of car park
<i>Decision:</i>	Approved 07/04/1999
<i>Application:</i>	1993/04124
<i>Description:</i>	Erection of Bus Station complex
<i>Decision:</i>	Approved 19/11/1993

The following Local Plan policies are considered likely to be relevant to the site:

- Policy LP1 – Presumption in favour of sustainable development
- Policy LP2 – Place shaping
- Policy LP3 – Location of new development
- Policy LP4 – Providing infrastructure
- Policy LP7 – Efficient and effective use of land and buildings
- Policy LP8 – Safeguarding employment land and premises
- Policy LP9 – Supporting skilled and flexible communities and workforce
- Policy LP13 – Town centre uses
- Policy LP14 – Shopping frontages
- Policy LP16 – Food and drink uses and the evening economy
- Policy LP18 – Dewsbury Town Centre
- Policy LP19 – Strategic transport infrastructure
- Policy LP20 – Sustainable travel
- Policy LP21 – Highways and access
- Policy LP22 – Parking
- Policy LP24 – Design
- Policy LP25 – Advertisements and shop fronts
- Policy LP27 – Flood risk

- Policy LP28 – Drainage
- Policy LP30 – Biodiversity & Geodiversity
- Policy LP31 – Strategic Green Infrastructure Network
- Policy LP32 – Landscape
- Policy LP33 – Trees
- Policy LP34 – Conserving and enhancing the water environment
- Policy LP35 – Historic environment
- Policy LP51 – Protection and improvement of local air quality
- Policy LP52 – Protection and improvements of environmental quality
- Policy LP53 – Contaminated and unstable land

Other relevant Supplementary Planning Documents and local and national guidance include:

- Hot Food Takeaway SPD (November 2021)
- Biodiversity Net Gain Technical Advice Note (June 2021)
- Planning Applications Climate Change Guidance (June 2021)
- Highway Design Guide SPD (November 2019)

National Planning Policy Framework (NPPF) (July 2021)

- Chapter 2 – Achieving sustainable development
- Chapter 4 – Decision-making
- Chapter 6 – Building a strong, competitive economy
- Chapter 7 – Ensuring the vitality of town centres
- Chapter 8 – Promoting healthy and safe communities
- Chapter 9 – Promoting sustainable transport
- Chapter 11 – Making effective use of land
- Chapter 12 – Achieving well-designed places
- Chapter 14 – Meeting the challenge of climate change, flooding and coastal change
- Chapter 15 – Conserving and enhancing the natural environment
- Chapter 16 – Conserving and enhancing the historic environment
- Chapter 17 – Facilitating the sustainable use of minerals

Pre-Application Consultation

As part of the Council's pre-application advice service, we have consulted internal colleagues who would be part of the decision making process should an application be received. Teams and Officers consulted to date include:

- KC Conservation & Design
- KC Crime Prevention
- KC Ecology
- KC Environmental Health
- KC Highways Development Management
- KC Lead Local Flood Authority
- KC Waste Strategy

These pre-application consultee responses are attached to this letter.

Consultation with other internal consultees and external bodies took place under the EIA Screening Opinion. External consultees consulted to date include:

- Coal Authority
- Environment Agency
- Historic England
- Natural England
- West Yorkshire Fire Authority
- Yorkshire Water

Where received, these responses are attached to this letter. Further consultation with external consultees would also be necessary at application stage.

Principle of Development

Spatial Strategy

The proposal is for the refurbishment of and improvements to an existing bus station in Dewsbury town centre. Given this, the principle of development would be considered acceptable under adopted Development Plan and national planning policy, as well as being cognisant of the likely public benefits of the proposal to the local economy, sustainable development, and improved public transport infrastructure and facilities.

Town Centre Development

As the proposal is located within the defined town centre of Dewsbury, consideration should be given to the policy requirements around shop frontages, advertisements, and food and drink proposals under Policies LP13, LP14, LP16, and LP18. The applicant's attention is also drawn to the recently adopted Hot Food Takeaway SPD for consideration.

Design

Layout

Site Layout

The proposal would remove the existing coach stand island from the north of the site, as well as removing the existing boundary wall and staff/visitor car parking spaces to the south, and bus layover bays to the west. These would be replaced with significantly increased areas of soft landscaping across the site, the introduction of 2 additional bus stands on the northern side of the bus station, and revised locations for bus layover bays, bins stores, and ambulance station. The revised layout would maintain the existing one-way direction of traffic.

The proposed site layout is likely to be considered a betterment to the existing arrangements by making navigability through the site simpler, providing additional bus stands, and introducing a relatively large amount of soft landscaping areas on-site.

The proposed removal of the southern brick boundary wall and replacement with paladin-type fencing may need to be revised following discussions with KC Crime Prevention and Counter-Terrorism Security Advisors. Paladin-type fencing would also not likely be the

preferred option from an urban design perspective, with other options potentially being available. A Crime Prevention Statement would be required as part of a planning application to set out how the proposal addresses potential concerns/impacts of crime, terrorism, and anti-social behaviour.

Building Layout

The proposed internal building layout would remain largely unchanged, with notable exception at the south eastern corner where the existing retail and café offer would be re-designed to promote a much simpler and coherent arrangement of units. Public conveniences and staff areas would remain to the west of the southern station entrance and would include provision for a contemplation room and disability changing facilities. A new external Inspectors Office may be required, subject to confirmation, at the southern station entrance. The external appearance of this should be in-keeping with the overall aesthetic of the bus station. Concourse areas would be improved for passengers with additional seating and improved information displays. The proposed changes to the existing building layout would likely be considered acceptable.

Form, Scale & Massing

The form, scale and massing of the station building would not be significantly altered under the proposals. The main exterior elevational changes would be to the roof. The proposal would introduce a 6° mono pitched-type ETFE glazed roof running between the northern and southern entrances. The roof of the main concourse area would be fitted with rooflights and solar PV panels. The flat roof to the east of the bus station would remain and be fitted with solar PV panels and an area of green roof. A glazed canopy would cover the stations' western pedestrian entrance.

The proposed changes to the building's exterior would likely provide a more visually attractive and safer environment for users. It is likely that the proposal would be considered acceptable under Policy LP24. Officers note that the final design of the proposal may be subject to change following the RIBA design process, but advise that the proposal as submitted represents a design scheme that the Local Planning Authority would likely be supportive of.

Materials & Signage

The proposed materials, as identified on the submitted proposed elevation plans, including the use of more a muted colour scheme, would offer a contemporary finish the bus station and would likely complement the surrounding built form as a modern public transport hub. The significant areas of glazing, particularly at the northern and southern station entrances, would offer good legibility to the building and natural surveillance.

The proposed corporate signage would reflect the current signage used in the WYCA Metro area. The numbering of bus stands would be clear and unobtrusive, and easily legible. Careful consideration would be required to the exterior southern signage of the retail offer in proposed Retail Area 3 given its proximity directly opposite the Grade II* Listed Dewsbury Minster. The relevant Development Plan policies in this regard are set out in the 'Principle of Development' section of this advice.

On-Site Landscaping

There would be a significant increase in the amount of soft landscaping on the site as a result of the proposal. A number of trees are proposed to be introduced, however some (in the south western corner) would be removed. The proposal would also introduce a green roof at the south eastern corner of the existing building, above the retail units. This is likely to be considered a welcomed addition to the scheme as an efficient use of space for providing biodiversity net gain. Full landscaping plans would also be required detailing the proposed hard and soft landscaping arrangements along with a maintenance plan for the areas of soft landscaping. Arboricultural information and assessment would also be required as part of a planning application for those trees identified to be removed.

Landscape Character

Policy LP32 requires that proposals should be designed to take into account and seek to enhance the landscape character of their area. As the proposal is for the refurbishment of an existing and well-established bus station in a prominent location on Aldams Rd, the proposed upgrade works to the exterior elevations, roof, and signage are likely to be considered appropriate in landscape character terms. The proposed visual betterments to the site's surrounding area, both in terms of the new built form and increased landscaping at the south of the site, are likely to be considered in accordance with Policy LP32.

Amenity

Air Quality

The site lies outside of the nearby Air Quality Management Area. However, the site is accessed from Aldams Rd, which is a road of concern in terms of air quality management. The information provided for the EIA Screening Opinion notes there likely wouldn't be a significant change in levels of traffic using the site resulting from the proposal. KC Environmental Health concur that significant detrimental effects on air quality from the proposal would be unlikely. An Air Quality Assessment would therefore not be required as part of a planning application.

Noise

The site is already in use as a well-established bus station with associated noise levels already being experienced in the area. The refurbishment of the bus station is unlikely to significantly and/or detrimentally increase the existing levels of noise pollution from/around the site during operation. A Noise Impact Assessment would therefore not be required as part of a planning application.

External Lighting

New external lighting is likely to be required as part of the proposal. A detailed lighting specification should be submitted in support of a future planning application. The lighting should include the following information:

- a) The proposed hours of operation of the lighting
- b) The location and specification of all of the luminaires
- c) The proposed design level of maintained average horizontal illuminance for the areas that needs to be illuminated which should be shown to be suitable (and not excessive) for the intended use by reference to appropriate guidance.

- d) The measures that will be taken to minimise or eliminate glare and stray light, arising from the use of the lighting, that is caused beyond the boundary of the area that needs to be illuminated
- e) The methods of switching and controlling the lighting so that it is only operated at the permitted times and at times when it is required.

External lighting should be installed and maintained in accordance with the “Guidance Notes for the Reduction of Obtrusive Light” by the Institution of Lighting Professionals: 2011 www.theilp.org.uk. The predicted levels of stray light must not exceed the recommended maximum levels given in Table 2 of this guidance for the corresponding Environmental Zone.

Refuse & Waste

Initial concerns have been raised by KC Waste Strategy regarding the location and accessibility of the proposed bin store area at the rear of the commercial units at the east of the site. Confirmation of the ability for Refuse Collection Vehicles to safely access and unload the western bin store would also be required. The applicant is advised to carefully consider the consultee comments attached and liaise directly with the Waste Collection Authority prior to the submission of a planning application to find a satisfactory solution to on-site refuse and waste storage and collection. Further information in this regard would also need to be submitted as part of a Transport Statement in support of a planning application.

Construction Matters

As the proposal's construction would likely be phased to allow for the continuing operation of the bus station, information pertinent to this phase of development would be required, either as part of a planning application or as pre-commencement conditions, should planning permission be granted. Information likely to be required includes a Construction Environmental Management Plan (CEMP) and Construction Access Management Plan (including Construction Method Statement). Further details about the requirements of these plan are set out in the consultee responses from KC Environmental Health and KC Highways Development Management. A Site Waste Management Plan would also be likely to be required to control the removal of solid waste from the site throughout the re-development process.

Highways Safety

Access & Traffic Management

The proposal is not expected to significantly alter the existing quantum/patterns of use of the existing bus station. As a result of this, a Transport Statement would be required in support of a forthcoming planning application, rather than a full Transport Assessment. Within the TS, Stage 1 Road Safety Audits would be required for the off-site changes to pedestrian crossings at the northern and southern site entrances, as well as any changes to the layouts of existing site entrances and exits. Further details of the technical requirements for the TS are set out in KC Highways consultee comments.

Vehicle tracking for Stands 13, 14, and 15 should be assessed to ensure requisite bus turning is provided without the need for 3-point turns and/or impacting on the proposed pedestrian area to the west of the site and the cycle parking facilities. Vehicle tracking should also be shown for bus movements entering and exiting the site in forward gear.

As the construction phase of development would likely be phased, information would be required relating to the provision of temporary bus stops and services, and the provision of bus layover spaces, etc. for the duration of the construction phase to ensure the continued safe usage of the site during this time. Further requirements are set out in KC Highways consultee comments.

The proposal's potential impacts on highways safety are not considered likely to be significant, subject to the requisite information and assessments being provided to a satisfactory standard, and consultation with KC Highways Development Management and KC Highways Structures being undertaken during any forthcoming planning application. It is considered likely that the proposal would be in accordance with Policy LP21 and NPPF (Chapter 9).

Car & Cycle Parking

The proposal would remove 14 staff/visitor car parking spaces from the site. However, 2 contractor vehicle parking spaces would be retained at the south of the site, with provision for electric vehicle charging. The existing spaces would be replaced by bus layover/out of service bays and an area of soft landscaping against Aldams Rd. No visitor/staff car parking would be retained on-site.

As the site lies within Dewsbury Town Centre and aims to encourage modal shift through the provision of a modern and safe bus station, the removal of a small number of private car parking from the site is likely to be considered acceptable, given the nearby car parking facilities and access to public/active travel routes. Notwithstanding this, the loss of on-site car parking would need to be fully justified as part of a planning application.

8 cycle storage spaces are proposed: 4 at the western entrance and 4 at the northern entrance. These are located in areas with good natural surveillance but would need to be covered and secure. Given the proximity to nearby cycle routes, additional cycle storage provision should be considered, potentially at the southern entrance.

Electric Vehicle Charging

Proposals including the provision of Electric Vehicle Charging Points (EVCPs) should meet the recommendations in the West Yorkshire Low Emission Strategy (WYLES) current at the time of the application. For non-residential developments WYLES requires a standard EVCP for at least 10% of parking spaces. Further details have been provided by KC Environmental Health in their attached consultee comments.

Active Travel

The proposal lies in the vicinity of a number of local and national active travel routes and other public transport facilities. Consideration should be given to improved connectivity and/or signposting to these routes within the proposed development, in line with Policies LP19 and LP20.

Flood Risk & Drainage

Flood Risk

The site lies within Flood Zones 1 and 2 and is in the vicinity of the River Calder. KC Lead Local Flood Authority have confirmed that a sequential test would not be required in this instance. Nevertheless, a Flood Risk Assessment would be required to support a planning application. Further details of the recommended requirements to include in a site-specific FRA are set out in KC LLFA's attached consultee comments.

The applicant is also advised to seek additional pre-application advice directly from KC LLFA and the Environment Agency regarding the scope and extent of flood risk and the management of nearby water bodies.

Surface & Foul Water Drainage

The site is already operating as a well-established bus station. However, as a major development, the NPPF and adopted Development Plan are clear that the proposal should provide on-site sustainable drainage solutions, following the sustainable drainage hierarchy. As such, a SuDS-based surface water drainage strategy should be submitted in support of any forthcoming planning application. This should include pollution control measures for both the construction and operational phases of development. Re-use of water on-site should also be given consideration as a means of sustainable development. An ongoing management and maintenance plan would also be required.

It is noted that the installation of a new on-site sustainable drainage strategy may present some difficulties. The applicant is therefore advised to liaise with KC LLFA prior to the submission of a planning application to discuss the feasibility of such an approach, as well as other potential options for the betterment of the local drainage and water environments.

It is expected that the foul water drainage strategy on-site would remain largely the same as it currently used. However, any changes to the foul water drainage system should be considered as part of a Drainage Strategy. This should also take into account any requirements for pollution control measures from commercial outlets and kitchens. An ongoing management and maintenance plan for these mitigative works would also be required.

Yorkshire Water have confirmed the presence of operational sewer assets in and around the site which should not be impacted by the groundworks required by the proposal.

Heritage

The site lies in the immediate setting of the Grade II* Listed Dewsbury Minster and in the wider vicinity of a number of other Grade II Listed Buildings and an unlisted asset of community value. The proposal would not introduce significant new built form within the setting of the nearby heritage assets, thus being unlikely to impact on the significance of the assets or their settings.

KC Conservation and Design have raised no concerns with the proposal in terms of heritage impacts at this stage. However, the applicant is advised to seek advice from Historic England due the proximity of the site to a Grade II* Listed Building, as HE would need to be consulted as a statutory consultee under any forthcoming planning application.

Depending on the advice received from Historic England, a suitable Heritage Statement may be required as part of planning application to assess the potential impacts of the proposal. If a full Heritage Statement is not considered to be necessary, some qualitative assessment of

the proposal's potential heritage impacts should still be undertaken as part of a Planning Statement in relation to Policy LP35 and NPPF (Chapter 16).

Ecology & Biodiversity

Protected Species

The site lies in a Bat Alert Area and in a Swift (*Apus apus*) Nesting Record (Birds of Conservation Concern Red List) area. The existing building is considered to have potential to host bat roosts given its construction. Up-to-date Bat Roost Surveys would therefore need to be submitted with a forthcoming planning application. Provision of bat and Swift nesting boxes are likely to be considered appropriate from KC Ecology, so early inclusion in the scheme would likely be beneficial.

Given the site's location and existing use, an Ecological Impact Assessment (EclA) would be required as part of a planning application to assess the likely ecological constraints of the proposal, identify any likely mitigation measures required, and identify opportunities for the delivery of on-site ecological enhancements.

Biodiversity Net Gain

Policy LP30 and NPPF (Chapter 15) Paragraph 174 both require Biodiversity Net Gains to be achieved and secured through a planning application. In accordance with the Environment Bill 2021 (secondary legislation outstanding) and with Kirklees Council's Technical Advice Note on Biodiversity Net Gain (June 2021), it is advised that a 10% net gain is demonstrated utilising the most up to date version of DEFRA's Biodiversity Metric.

The metric excel spreadsheet and any GIS layers used to carry out the calculations should also be supplied along with the application to enable the LPA to verify the calculations. BNG should be delivered on-site in the first instance, with off-site financial contributions able to be considered where on-site BNG is proven not to be feasible, and all other options have been exhausted.

Other Material Considerations

Contaminated Land

The site is identified as being potentially contaminated due to its previous use. Policy LP53 requires the submission of appropriate land contamination assessments for land at risk of or that is already potentially contaminated. As the proposal would include intrusive ground works within an area of identified potentially contaminated land (e.g., removal of the existing coach stand island), a Phase 1 Contaminated Land Report would be required in support of a planning application, with further intrusive surveys and remediation/verification possibly being required.

All contamination reports shall be prepared in accordance with guidance in:

- Land Contamination Risk Management (LCRM)
- BS 10175:2011+ A2:2017 Investigation of Potentially Contaminated Sites. Code of Practice

- Development on Land Affected by Contamination - Technical Guidance for Developers, Landowners & Consultants - (v11.2) June 2020 by the Yorkshire and Lincolnshire Pollution Advisory Group

Climate Change & Sustainable Construction

The Council approved Climate Emergency measures at its meeting of full Council on the 16th of January 2019, and the West Yorkshire Combined Authority has pledged that the Leeds City Region would reach net zero carbon emissions by 2038. A draft Carbon Emission Reduction Pathways Technical Report (July 2020, Element Energy), setting out how carbon reductions might be achieved, has been published by the West Yorkshire Combined Authority.

On the 12th of 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 predates 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 would use the relevant Local Plan policies and guidance documents to embed the climate change agenda.

At application stage you would need to submit supporting information to demonstrate that the proposed development would achieve net gains in respect of all three sustainable development objectives (economic, social, and environmental).

NPPF (Chapters 2, 9, 14, and 15) are particularly relevant to your proposals in relation to climate change, as are Local Plan Policies LP1, LP20, LP21, LP24, LP27 and LP28, and the vision and strategic objectives set out in Chapter 4 of the Local Plan.

A Climate Change Statement should be provided as part of a planning application setting out the how the proposal has been designed to reduce and minimise energy consumption, and its approach to sustainable development.

Permitted Development

All areas for consideration as part of the proposal should fall under the site's red line boundary area, with the relevant notice being served on 3rd Party landowners as part of a planning application. This includes proposed works at the entrance from South St to the north of the site and works at the site accesses onto Aldams Rd at the south of the site. The proposed realignment of the existing crossing on Aldams Rd to the east of the site should also be considered as part of a forthcoming planning application. These works would also need to be secured under a Section 278 Agreement with the Local Highway Authority.

Although some elements of the proposed internal changes to the bus station may be able to be completed under Permitted Development Rights, the applicant is advised to apply for all proposed works under a planning application. This would provide certainty and clarity over the works being proposed and allow for full consideration of the potential impacts of the proposal in combination with the required external works. This would be particularly relevant in relation to the in-combination effects of the phased construction of the development,

where the bus station would remain operational, as the internal works would likely be of a scale to require some level of control of pollutants and particulates to reduce their impacts on human health and the wider environment.

Application Documents

As a minimum, the following drawings and documents would be necessary for any forthcoming planning application to be considered valid:

- Application Form
- Location Plan
- Full set of Existing and Proposed Plans and Elevations
- Design and Access Statement
- Planning Statement
- Flood Risk Assessment
- Surface and Foul Water Drainage Strategy
- Biodiversity Net Gain Statement
 - DEFRA Biodiversity Net Gain Metric (latest version)
- Climate Change Statement
- Arboricultural Impact Assessment / Arboricultural Method Statement
- Crime Prevention Statement
- Heritage Statement
- Bat Roost Assessment
- Ecological Impact Assessment
- Contaminated Land Assessment
- Transport Statement
 - Stage 1 Road Safety Audits
 - Construction Access Management Plan

The validation requirements would be determined by the final nature of any scheme put forward and clarification can be provided as required in due course.

Kirklees Local Planning Authority published their updated Validation Requirements for the Submission of Planning Applications document (also known as a 'Local List') in November 2022. The document sets out the information to support a planning application required by the LPA.

Applications which do not to comply with the document's requirements are unlikely to be validated. However, to give applicants time to become familiar with the document's requirements, this approach will not come into effect until the 6th of February 2023.

Even if seeking to submit a proposal prior to this date, you are encouraged to review the Validation Requirements for the Submission of Planning Applications for information purposes. The document can be found [here](#).

Summary

The proposal for the re-development/refurbishment of Dewsbury Bus Station as submitted is one which the LPA could likely support, subject to the submission of satisfactory information and assessments, as set out within this pre-application advice. Several recommendations have been made for the applicant to liaise with individual internal and external consultees to

determine the scope of various reports and assessments prior to the submission of a planning application. For those areas where liaison with internal consultees is recommended, Officers would be able to facilitate those discussions with the applicant. Where liaison with external consultees has been recommended, the applicant is advised to contact them directly through their respective pre-application advice services.

Should the applicant wish to amend the proposal, Officers would be happy to make brief general comments and observations under this pre-application enquiry. However, should the applicant wish to seek further full pre-application advice on an amended proposal, including the re-consultation of internal consultees, another pre-application enquiry should be submitted.

This advice is offered in good faith and to the best of our ability, without prejudice to consideration of a formally submitted planning application which may generate previously unknown issues either through responses to statutory consultations or evaluation of the more detailed information submitted with the application. These comments are also made at Officer level without prejudice to any future decision made by the Head of Planning and Development or the Spatial Planning Committee or the Huddersfield and Heavy Woollen District Planning Area Sub-Committees. These comments do not constitute a formal planning decision.

Yours sincerely

R Riggs

Richard Riggs
Senior Planning Officer

Appendix B. List of Drawings

DRAWING	REFERENCE
SITE LOCATION PLAN	2025_DBS-JSA-ZZ-ZZ-DR-A-01100_P2
LOCATION PLAN	DBS-JSA-ZZ-ZZ-DR-A-01800_P1
EXISTING SITE PLAN	DBS-JSA-ZZ-ZZ-DR-A-01801_P1
PROPOSED SITE PLAN	DBS-JSA-ZZ-ZZ-DR-A-01811_P1
EXISTING GA PLAN	DBS-JSA-ZZ-ZZ-DR-A-02801_P1
EXISTING ROOF PLAN	DBS-JSA-ZZ-ZZ-DR-A-02802_P1
PROPOSED GA PLAN	DBS-JSA-ZZ-ZZ-DR-A-02811_P1
PROPOSED ROOF PLAN	DBS-JSA-ZZ-ZZ-DR-A-02812_P1
MAIN BUILDING DEMOLITION PLAN	DBS-JSA-ZZ-ZZ-DR-A-02813_P1
CONCOURSE ACCESSIBILITY AND PASSENGER INFORMATION CONCEPT	DBS-JSA-ZZ-ZZ-DR-A-02814_P1
EXISTING SITE SECTIONS	DBS-JSA-ZZ-ZZ-DR-A-03801_P1
EXISTING GA SECTIONS SHEET 1	DBS-JSA-ZZ-ZZ-DR-A-03802_P1
EXISTING GA SECTIONS SHEET 2	DBS-JSA-ZZ-ZZ-DR-A-03803_P1
PROPOSED SITE SECTIONS	DBS-JSA-ZZ-ZZ-DR-A-03811_P1
PROPOSED GA SECTIONS SHEET 1	DBS-JSA-ZZ-ZZ-DR-A-03812_P1
PROPOSED GA SECTIONS SHEET 2	DBS-JSA-ZZ-ZZ-DR-A-03813_P1
EXISTING ELEVATIONS SHEET 1	DBS-JSA-ZZ-ZZ-DR-A-04801_P1
EXISTING ELEVATIONS SHEET 2	DBS-JSA-ZZ-ZZ-DR-A-04802_P1
EXISTING ELEVATIONS SHEET 3	DBS-JSA-ZZ-ZZ-DR-A-04803_P1
PROPOSED ELEVATIONS SHEET 1	DBS-JSA-ZZ-ZZ-DR-A-04811_P1
PROPOSED ELEVATIONS SHEET 2	DBS-JSA-ZZ-ZZ-DR-A-04812_P1
PROPOSED ELEVATIONS SHEET 3	DBS-JSA-ZZ-ZZ-DR-A-04813_P1
CYCLE SHELTER / EXTERNAL BIN STORE DETAIL	DBS-JSA-ZZ-ZZ-DR-A-05801_P1
RETAIL UNIT EXTERNAL BIN STORE DETAIL	DBS-JSA-ZZ-ZZ-DR-A-05802_P1
GENERAL & EMERGENCY LIGHTING LAYOUT (SHEET 1 OF 3)	B2382808-JAC-XX-GF-DR-E-1111
GENERAL & EMERGENCY LIGHTING LAYOUT (SHEET 2 OF 3)	B2382808-JAC-XX-GF-DR-E-1112
GENERAL & EMERGENCY LIGHTING LAYOUT (SHEET 3 OF 3)	B2382808-JAC-XX-GF-DR-E-1113
PV LAYOUT (SHEET 1 OF 3)	B2382808-JAC-XX-GF-DR-E-1711
PV LAYOUT (SHEET 2 OF 3)	B2382808-JAC-XX-GF-DR-E-1712
PV LAYOUT (SHEET 3 OF 3)	B2382808-JAC-XX-GF-DR-E-1713
LANDSCAPE GENERAL ARRANGEMENT	B2382808-JAC-GEN-XX-DR-L-3001_P1
SOUTHERN WALL AND PLANTING	B2382808-JAC-GEN-XX-DR-L-3002_P1
HARD LANDSCAPE	B2382808-JAC-GEN-XX-DR-L-3003_P1
SOFT LANDSCAPE ZONE 4	B2382808-JAC-GEN-XX-DR-L-3004_P1
SOFT LANDSCAPE ZONE 5	B2382808-JAC-GEN-XX-DR-L-3005_P1
SOFT LANDSCAPE ZONE 6	B2382808-JAC-GEN-XX-DR-L-3006_P1
SOFT LANDSCAPE ZONE 9	B2382808-JAC-GEN-XX-DR-L-3007_P1

GENERAL ARRANGEMENT	B2382808-JAC-GEN-XX-DR-ZZ-3001-P01
SITE CLEARANCE AND DEMOLITION	B2382808-JAC-GEN-XX-DR-ZZ-3002
EXISTING SITE LAYOUT	B2382808-JAC-GEN-XX-DR-ZZ-3003
KERBS, FOOTWAYS AND CARRIAGEWAY PAVEMENT	B2382808-JAC-GEN-XX-DR-ZZ-3004
ROAD MARKINGS AND SIGNS	B2382808-JAC-GEN-XX-DR-ZZ-3005
FENCING, GUARDRAILS AND STREET FURNITURE	B2382808-JAC-GEN-XX-DR-ZZ-3006
EXISTING SERVICES	B2382808-JAC-GEN-XX-DR-ZZ-3007
PROPOSED SERVICES	B2382808-JAC-GEN-XX-DR-ZZ-3008
EXTERNAL LIGHTING	B2382808-JAC-GEN-XX-DR-ZZ-3009
PROPOSED DRAINAGE	B2382808-JAC-GEN-XX-DR-ZZ-3010
VEHICLE TRACKING SHEET 1 OF 5	B2382808-JAC-GEN-XX-DR-ZZ-3011
VEHICLE TRACKING SHEET 2 OF 5	B2382808-JAC-GEN-XX-DR-ZZ-3012
VEHICLE TRACKING SHEET 3 OF 5	B2382808-JAC-GEN-XX-DR-ZZ-3013
VEHICLE TRACKING SHEET 4 OF 5	B2382808-JAC-GEN-XX-DR-ZZ-3014
VEHICLE TRACKING SHEET 5 OF 5	B2382808-JAC-GEN-XX-DR-ZZ-3015
VISIBILITY FROM SOUTHWEST CROSSING	B2382808-JAC-GEN-XX-DR-ZZ-3016
VISIBILITY FROM NORTHEAST CROSSING	B2382808-JAC-GEN-XX-DR-ZZ-3017

Appendix C. Planning and Environmental Consenting Strategy



West Yorkshire Combined Authority

TRANSFORMING CITIES FUND - DEWSBURY BUS STATION

Planning and Environmental Consenting Strategy



West Yorkshire Combined Authority

**TRANSFORMING CITIES FUND -
TRANSFORMING CITIES FUND - DEWSBURY
BUS STATION**

Planning and Environmental Consenting Strategy

WSP

Three White Rose Office Park
Millshaw Park Lane
Leeds
LS11 0DL

Phone: +44 113 395 6200

Fax: +44 113 395 6201

WSP.com

QUALITY CONTROL

Remarks				
Date				
Prepared by				
Signature				
Checked by				
Signature				
Authorised by				
Signature				
Project number				
Report number				
File reference				

CONTENTS

TABLES

Table 3-1 - Gazetteer of known non-designated historic assets	10
Table 4-1 – Kirklees Local Plan Strategy and Policies Strategic Objectives	22
Table 6-1 – Planning Application Steps and Timelines	35

APPENDICES

APPENDIX A

FIGURES

APPENDIX B

ECOLOGICAL CONSTRAINTS REPORT AND PRELIMINARY BAT ROOST
ASSESSMENT



APPENDIX C

ARBORICULTURAL ASSESSMENT REPORT

1.1

- 1.1.1. The Transforming Cities Fund (TCF) comprises a £317m programme of investment that aims to deliver a transformational programme of new infrastructure and help create a step change in travel across the Leeds City Region (LCR). West Yorkshire Combined Authority (WYCA), on behalf of the LCR, submitted a Strategic Outline Business Case (SOBC) funding bid to the Department for Transport (DfT) under the TCF programme in November 2019. The SOBC detailed the development of 22 packages of schemes across the city region, identified to achieve the LCR TCF vision and programme objectives as outlined below.
- 1.1.2. The West Yorkshire Combined Authority's TCF Vision is:
- “to support delivery of inclusive growth across the Leeds City Region, through an innovative and coordinated walking, cycling and bus package, which provides genuine sustainable and healthy travel options for our communities along our corridors of greatest economic need, and transforms accessibility from new development sites and accommodates growth at key public transport hubs.”*
- 1.1.3. The vision has shaped the TCF objectives, which are:
- Enabling inclusive growth – *“To enable as many people as possible to contribute to and benefit from economic growth, and contribute to improved health and wellbeing of our residents”;*
 - Boosting productivity – *“Working with businesses and universities to close the productivity gap, create thousands of jobs and add substantially to our economy”;*
 - Supporting clean growth – *“Achieving our target for a net zero carbon economy by 2038 through lowering carbon emissions and taking advantage of new innovations to create jobs and growth”;* and
 - Delivering 21st century transport – *“Creating a transport system which addresses the challenges we face around capacity, connectivity, sustainability and air quality.”*
- 1.1.4. Within Dewsbury, TCF funding will be used to improve access across the town centre. There will be improvements to the walking and cycling routes within the town, as well as better access to the rail and bus stations. These changes will contribute to LCR's goal of being a carbon neutral economy by 2038.
- 1.1.5. The Dewsbury Bus Station scheme (hereafter the Proposed Scheme) is part of these improvements and will be funded under the TCF. The Proposed Scheme is the focus of this Planning and Environmental Consenting Strategy.
- 1.1.6. The Proposed Scheme, will seek to contribute to the TCF vision and objectives, in terms of better connecting people through affordable and sustainable transport measures. The Proposed Scheme aims to improve access to the bus station and refurbish the internal building to a higher standard, as well as offer opportunities to improve energy efficiency on site.
- 1.1.7. The Proposed Scheme will contribute to the wider ambitions for Dewsbury as a town, enabling the town centre to strengthen and sustain its economic role within the region, contributing to the delivery of the LCR's vision for 'good growth'.

1.2

- 1.2.1. The purpose of this Planning and Environmental Consenting Strategy is to present a clear strategy and roadmap for the environmental and planning delivery of the Proposed Scheme. This document should inform consultation on the Planning and Environmental Consenting Strategy with key stakeholders.
- 1.2.2. This report provides an evidence base and recommendations to inform the discussion and agreement of a consenting strategy that maximises the likelihood of the Proposed Scheme successfully obtaining consent and their delivery within the available funding timescales.
- 1.2.3. The aims of this report are to:
 - Identify environmental and planning constraints and opportunities;
 - Define appropriate consenting routes to deliver the Proposed Scheme (i.e. planning applications and / or Permitted Development), including an approach to Environmental Impact Assessment (EIA) Screening;
 - Identify any further consents that may be required (e.g. Tree Preservation Orders (TPO's), protected species license, Listed Building consent);
 - Identify the scope of further activities required to deliver these consents; and
 - Provide initial high-level design advice to ensure impacts are avoided or mitigated, and enhancements included wherever possible to ensure the Proposed Scheme delivers a quality design and maximises the likelihood of successful consenting applications.

1.3

- 1.3.1. The remainder of this report is structured as follows:
 - **Chapter 2: Background**. This chapter provides a background to the Proposed Scheme and a summary of the current design;
 - **Chapter 3: Environmental Constraints**. This chapter sets out a summary of the key environmental constraints that are relevant to the design and consenting of the Proposed Scheme;
 - **Chapter 4: Planning Constraints**. This chapter sets out the planning constraints relevant to the design and consenting of the Proposed Scheme;
 - **Chapter 5: Consenting Context**. This chapter sets out the context of planning and environmental consents and associated legislative requirements in which the consenting strategy has been developed;
 - **Chapter 6: Consenting Strategy**. The proposed consenting strategy, including Permitted Development rights, other consents and potential requirement for planning permission, and the approach to EIA;
 - **Chapter 7: Design Advice**. This chapter provides initial recommendations for how further design work can avoid or mitigate environmental impacts and provide enhancements;
 - **Chapter 8: Recommended Tasks**. This chapter sets out the recommended tasks that should be undertaken to deliver the strategy set out in this report;
 - **Chapter 9: Summary**. This chapter provides a summary of the key recommendations within this report; and

- . This comprises the figures that accompany this report for the Proposed Scheme.
- This comprises the full Ecological Constraints Assessment and the Preliminary Bat Roost Assessment.
- . This comprises the findings from the Arboricultural Survey, the Tree Protection Plan and the Arboricultural Method Statement.

2.1

- 2.1.1. The LCR TCF schemes will encourage investment in Dewsbury and support economic growth in an area marked by a rapidly growing population. Improving access to public transport is a key part of this.
- 2.1.2. The existing Dewsbury Bus Station is located to the south of Dewsbury town centre. It is bounded to the west by Dewsbury Police Station, to the north by South Street (one-way westwards), and to the south by the ring road (Aldams Road). To the east, between Church Street and the bus station building, is a private car park, retail units and a small greenspace adjacent to the ring road. The bus station is a key gateway for Dewsbury.

The Proposed Scheme has been developed following the identification of issues at the existing bus station and the adjacent area, in particular for bus user experience:

- 2.1.3. The primary issues and challenges relating to transport which have been identified are:
- Unattractive environment;
 - Personal safety concerns, resulting from prevalent anti-social behaviour;
 - Road safety concerns;
 - Lack of services within the bus station; and
 - Poor pedestrian access to the bus station.
- 2.1.4. The scheme has been proposed to enhance the appearance of the bus station, improve accessibility within the bus station and also to the town centre, as well as boosting pedestrian and cycling access to the site.

2.2

- 2.2.1. The Dewsbury Bus Station scheme consists of a number of proposals to improve the facility for passengers including:
- Refurbishment of the internal and external elements of the bus station;
 - Introduction of entrance improvements including glazing and a proposed atrium area to improve the sense of place;
 - Improved retail space for new tenants;
 - External building cladding to modernise the structure;
 - Strengthening signage and wayfinding to improve integration and accessibility;
 - Reconfiguration of the bus apron area to improve safety and efficiency;
 - New contractor parking with an EV charging point;
 - Landscaping and boundary improvements;
 - Sustainability improvements to contribute to carbon reduction and energy efficiency;
 - Introduction of cycle storage facilities;
 - Possible green route through the site to improve pedestrian linkages; and
 - Integration with Kirklees Aldams Road and South Street proposals.

The Proposed Scheme will be the the Do Maximum option which includes all of the items identified in the above scenarios in addition to further desirable improvements to provide a high-quality

modern facility. Do minimum and do something options where considered but discounted after review.

- 2.2.2. The Proposed Scheme covers an area of 1.1 ha.
- 2.2.3. The extent of the Proposed Scheme is referred to as the 'Site Boundary' throughout this report. Figure A-1 (see Appendix A) shows this Site Boundary and the Site Layout for the Proposed Scheme. Elements in Figure A-1 that are outside the Site Boundary are not considered in this report.

3.1

- 3.1.1. A review of publicly available information has been undertaken to inform an understanding of environmental constraints relevant to the Proposed Scheme. An environmental constraints review was undertaken in September 2021 and has been used to inform this report. The environmental constraints are identified and set out below and the environmental constraints map is shown in Appendix A.
- 3.1.2. For all environmental topics in this chapter, constraints have been identified within 1 km of (and including) the Site Boundary. This 1 km area is known as the 'Study Area'. Where there are exceptions to the extent of the Study Area, this is stated in the corresponding topic section.

3.2

- 3.2.1. Potential sensitive receptors in proximity to the Site Boundary include users of the local road network, users of nearby Public Rights of Way and commercial receptors near the site. There are no residential receptors located immediately adjacent to the site, however there are multiple places of worship near the Site Boundary, including Dewsbury Minster, 50 m east.
- 3.2.2. There are no Air Quality Management Areas (AQMAs) within the Site Boundary.
- 3.2.3. Within the Study Area, there is one active AQMA. Kirklees AQMA 5, is approximately 330m north-east, (see Figure A-2 in Appendix A). It includes Leeds Road (A653), Dewsbury Ring Road (A638), Wakefield Road (A638), Highgate Road, Highgate Terrace, Bank Street and Old Bank Road. This AQMA was assigned in 2017 due to heightened NO₂ concentrations¹. Kirklees AQMA 2 was also partially located within the Study Area, however it was revoked in 2020 due to improved air quality². It is approximately 890 m south-west and includes part of the A644 (Huddersfield Road). It had been declared in 2009 due to high concentrations of Particulate Matter PM₁₀.
- 3.2.4. There is one Air Quality Monitoring Site within the Site Boundary. The site ID is K1 (OS reference: 424506, 421535) and this is a non-automatic monitoring site that records NO₂ emissions. NO₂ concentrations were measured at 41.00 µg/m³ in 2019, and have declined by 14% since 2016. Despite the decline, the concentrations exceed the UK annual mean objective of 40 µg/m³.
- 3.2.5. There are eight other monitoring sites within the Study Area. Of these, two are focused in AQMA 5, and four are situated just outside this AQMA area:²

¹ UK AIR, (2021) Kirklees AQMA 5 Details – Amendment History. Available at: https://uk-air.defra.gov.uk/agma/details?agma_ref=1716 (Accessed: 21/09/2021)

² Kirklees Council (2020) 2020 Air Quality Annual Status Report. Available at: [Kirklees Council Annual Status Report 2020 Version 1.1](#) (Accessed: 21/09/2021)

- K20 (within AQMA 5, OS reference: 424853, 421828): This site had high levels of NO₂ concentrations in 2015, with a figure of 40.68 µg/m³, however this has declined by approximately 30% over the years. NO₂ concentrations in 2019 were 28.44 µg/m³, well below the UK annual objective of 40 µg/m³.
- K40: (within AQMA 5, OS reference: 424871, 421921): In 2015 this site had extremely high levels of NO₂, with concentrations of 60.39 µg/m³. This indicates a potential exceedance of the UK NO₂ 1-hour mean objective (signalled by an annual mean concentration of 60 µg/m³). These concentrations declined by around 13% to 2018, when NO₂ concentrations of 52.40 µg/m³ were recorded. The concentrations rose in 2019 to 55.80 µg/m³. The annual concentrations at this site constantly exceed the UK annual mean concentration objective of 40 µg/m³.
- K42 (OS reference: 424969, 422002): The NO₂ concentrations at this site originally exceeded the 40 µg/m³ objectives, with an annual mean concentration of 42.99 µg/m³ in 2015. This has since declined over the years to 35.13 µg/m³ in 2019.
- K43 (OS reference: 425083, 422022): NO₂ concentrations have fluctuated here around the 40 µg/m³ objective, the highest mean recorded being 43.97 µg/m³ in 2015, and the lowest mean concentration of 37.20 µg/m³ in 2019. 2016 and 2018 also saw concentrations exceed the 40 µg/m³ objective.
- K44 (OS reference: 425179, 422114): NO₂ concentrations at this site have been declining since 2015, from 36.68 µg/m³ to 30.80 µg/m³ in 2019. The concentrations have consistently been under the UK mean annual objective of 40 µg/m³.
- K54 (OS reference: 425196, 421566): NO₂ concentrations have declined by between 19% and 20% at this monitoring site since 2015. In 2019, the NO₂ concentrations were 32.07 µg/m³. NO₂ concentrations at this site have consistently been under the UK mean annual objective of 40 µg/m³.

3.2.6. The two remaining monitoring sites within the Study Area are located to the southwest of the Proposed Scheme, near Scout Hill. The monitoring sites are as follows:

- K19 (OS reference: 423563, 421014): This is situated within Kirklees AQMA 2.³ NO₂ concentrations have fluctuated here, peaking at 45.20 µg/m³ in 2016 (over the 40 µg/m³ objective). This has since decreased by approximately 30% to 2019, where an annual mean NO₂ concentration was recorded of 31.60 µg/m³.
- K87 (OS reference: 424409, 421271): Data for this site is only available for 2018 and 2019. NO₂ concentrations were below the 40 µg/m³ threshold in both years, with the concentrations in 2019 recorded at 31.27 µg/m³.

3.2.7. The DEFRA UK Ambient Air Quality Map⁴ shows that 2019 annual particulate matter (PM) PM₁₀ average for within the Proposed Scheme Site is approximately 14.35 µg/m³. This is below the

³ Kirklees Council (2020) 2020 Air Quality Annual Status Report. Available at: [Kirklees Council Annual Status Report 2020 Version 1.1](#) [Accessed: 21/09/2021]

⁴ DEFRA (2021) UK Ambient Air Quality Map <https://uk-air.defra.gov.uk/data/gis-mapping/> [Accessed: 21/09/2021]

average annual PM₁₀ requirement of 40 µg/m³ as set out in the Air Quality Standards Regulations 2010⁵.

- 3.2.8. Similarly, the 2019 annual PM_{2.5} average for within the Proposed Scheme Site Boundary is approximately 9.58 µg/m³. This is below the average annual PM_{2.5} requirement of 25 µg/m³ as set out in the Air Quality Standards Regulations 2010⁵.
- 3.2.9. The 2019 Air Quality Action Plan for Kirklees Council⁶ indicates several measures to deliver air quality improvements. These actions can be considered under 11 broad topics. These include:
- Alternatives to private vehicle use;
 - Environmental permits;
 - Freight and delivery management;
 - Policy guidance and development control;
 - Promoting low emission plants;
 - Promoting low emission transport;
 - Promoting travel alternatives;
 - Public information;
 - Transport planning and infrastructure;
 - Traffic management; and
 - Vehicle fleet efficiency.
- 3.2.10. Within the Air Quality Action Plan, there is an aim to encourage more shorter journeys to be taken on public transport, with the aim of reducing PM and NO₂ concentrations. Air quality is a key priority area of concern for Kirklees due to the impacts on the most vulnerable and deprived communities in the region.
- 3.2.11. Between 2016 and 2019 it has been observed that NO₂ concentrations have fallen by 13% across this district and this has been slightly higher within the AQMA's at 15-19%. Despite this, concentrations in some areas still exceed air quality objectives which indicates further work is required to bring about compliance.⁷

⁵ Government (2020) National Statistics: concentrations of particulate matter (PM₁₀ and PM_{2.5}) <https://www.gov.uk/government/publications/air-quality-statistics/concentrations-of-particulate-matter-pm10-and-pm25>. [Accessed: 21/09/2021]

⁶ Kirklees Council (2019) Air Quality Action Plan for Kirklees Council <https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/air-quality-action-plan.pdf>. [Accessed 21/09/2021]

⁷ Kirklees Council (2020) Air Quality Annual Status Report <https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/kirklees-annual-status-report-2020.pdf> [Accessed: 27/09/2021]

3.3

- 3.3.1. There are no listed buildings within or adjacent to the Site Boundary. There are 47 listed buildings within 1 km of the Proposed Scheme consisting of one Grade II* listed building and 46 Grade II listed buildings. The closest listed building to the Site Boundary is the Church of All Saints, also called Dewsbury Minster (NHLE 1134712), located 50 m east of the Site Boundary, a multi-period parish church with sections dating to the 13th, 14th, and 15th centuries and alterations and renovations dating to the 18th and 19th centuries.

There are no registered park and gardens within the Site Boundary. There is one registered park within the Study Area, the Grade II listed Crow Nest Park (NHLE 1001516) 850 m south-west of the Site Boundary.

There are no scheduled monuments either within the Site Boundary or within the Study Area. The closest scheduled monument to the site is the Thornhill Hall and moat (NHLE 1009930) including sites of formal gardens, bowling green, and remnants of pre-17th century open-field system located c 3.1 km south-east of the Site Boundary.

The Site Boundary does not lie within the boundaries of a conservation area but does lie c 70 m to the south of the Dewsbury Town Centre Conservation Area (CA) as designated by Kirklees Council in 1981.

- 3.3.2. A review of non-designated heritage assets obtained from the West Yorkshire Historic Environment Record on 1 October 2021 has been undertaken to ascertain the potential for buried heritage remains within the Proposed Scheme. One non-designated asset is shown extending into the Proposed Scheme boundary and an additional 27 non-designated assets are present within the 50m study area. The non-designated asset within the Proposed Scheme consists of the site of the late medieval Moot Hall / Rectory Manor (MWY3767). It is thought that the foundations are still extant below the existing road surface suggesting that there is significant potential for survival.
- 3.3.3. The area of the Proposed Scheme was included in two desk-based assessments, one on the Dewsbury Minster (EWY6656) and the other on Dewsbury Town (EWY7525). No physical archaeological investigations have been undertaken within the Proposed Scheme but a watching brief was undertaken within the Dewsbury Minster churchyard in 1999 (EWY6163), 35m to the south-east of the Proposed Scheme boundary. Investigations recorded several buried tombstones and graves thought to be post-medieval, and the foundations of stone-built walls identified as the remains of foundations of the 14th century vicarage which had been demolished in the early 1800s.
- 3.3.4. All of the non-designated assets within the Proposed Scheme and the 250 m study area are presented in detail in the Table 3-1.

MWY4839	24 Bond Street / 19 Croft Street, Dewsbury Victorian textile warehouse	Post-medieval	N
MWY6574	Aldam's Mill (demolished), Dewsbury	Post-medieval	N
MWY3767	Moot Hall / Rectory Manor (demolished), Dewsbury The former Rectory Manor was described by RCHME as a remarkable late 13th-century survival of a manor house; the building was probably originally used as meeting place for manorial courts, known as the Moot Hall and later put to various industrial type uses. A fine medieval stone building now demolished for road widening. It is possible that parts of the complex survive below ground.	Late Medieval	Y
MWY13263	Roman findspot Thought to have been found in 1821 on Mr Halliley's estate. Find consisted of a Roman spear found near a small stone building with an arch 3' below the surface and a filled-in masonry well. Other reports that may be connected suggest that a Roman jug was also recovered.	Roman	N
MWY2758	Britannia Mill Victorian textile mill	Post-medieval	N
MWY5500	Ten Cross slab grave covers at Church of All Saints, Dewsbury	Late Medieval	N
MWY1659	Three Pre-Conquest cross fragments at All Saint's Church, Dewsbury The cross fragments are still in the church. The group of three fragments are all carved from light-coloured local stone with only one side decorated. They are thought to have, at one time, formed a monolithic column.	Early Medieval	N
MWY5234	Two Pre-Conquest cross fragments All Saint's Church These two fragments are from the same cross shaft which is similar in character to PRN 2407, but this one is flat. (PRN 2407 was rounded). The first fragment is of local stone, worked with a chisel, and finished off by hacking along the more extended lines. One face depicts a veiled Virgin Mary, sitting with the Child on her knee. Above this image is what appears to be the lower half of another seated figure. The second fragment is of the same local stone. Only one carved face survives as the rest has broken away. This fragment shows what appears to be the Miracle at Cana and the Miracle of the Loaves and the Fishes, with inscriptions above each of the two carvings. These fragments date from mid- to late-9th century.	Early Medieval	N

MWY5235	Pre-Conquest cross fragment All Saint's Church This fragment was discovered during restoration in 1887 and is made of a different stone from the other ones. It is quite badly weathered and the carving has been almost obliterated in places. The design on one face has been interpreted as St Christopher bearing the Christ in his shoulder. Another face shows a figure with hands uplifted wearing a tall cap. This fragment appears to be the end of a cross arm of quite a large cross head and probably dates to mid- to late-9th century.	Early Medieval	N
MWY5237	Pre-Conquest cross fragment All Saint's Church This fragment represents the centre of a cross head, the design is chiselled with some hacking along the grooves. There is an angular twist near the central boss, and a knot design on one face. This fragment probably dates to the mid- to late 9th Century.	Early Medieval	N
MWY5238	Pre-Conquest cross fragment All Saint's Church This is a broken fragment of a cross head with cable edging. There is no design inside the cable edging on the front or back. The cable has been carefully modelled and then a sharp line has been incised at intervals. This is probably a later cross with decoration of an early style.	Early Medieval	N
MWY5239	Pre-Conquest cross fragment All Saint's Church This is a fragment of cross head which has sometimes been called the 'Paulinus cross'. On one face is an oval containing what appears to be a Latin cross and on the other face is a free, irregular pattern. This pattern either dates from the late 9th Century, or is a later cross using an earlier design style.	Early Medieval	N
MWY5240	Pre-Conquest cross fragment All Saint's Church This fragment of cross shaft was found beneath the flooring of the nave during restoration in 1887. One face is a late scroll design, and on another is a plait. On another face the is the lower part of a crucifix, and on the final face is what has been described as a 'monster holding a two pronged fork'. This fragment probably dates from the late 9th century.	Early Medieval	N
MWY5241	Pre-Conquest cross fragment, All Saints Church Dewsbury This fragment of cross shaft is very neatly carved and deeply chiselled. The pattern is of interlacing stalks that stop short of the crossings. The edges of the shaft have no ornamental carving. The fragment is not of local stone and is probably a later cross designed in an earlier style.	Early Medieval	N

MWY5242	Hogsback at All Saint's Church Two sides, and the end of a hog-back known as the 'Saxon Tomb' found at All Saint's Church, Dewsbury. Still in Dewsbury Church.	Early Medieval	N
MWY6575	Dewsbury Working Men's Club	Post-medieval	N
MWY12610	Warehouse, 28 Wellington Road	Post-medieval	N
MWY12612	Warehouse, 23-25 Wellington Road	Post-medieval	N
MWY12609	Warehouse, 26 Wellington Road	Post-medieval	N
MWY4850	Dewsbury Library and Public Baths	Post-medieval	N
MWY12632	Warehouse, 23 Bond Street	Post-medieval	Y
MWY11082	Woollen warehouse and offices, 15 Wellington Road, Dewsbury	Post-medieval	N
MWY11708	Dewsbury Railway Station	Post-medieval	N
MWY11075	Anchor Mill Webster Hill Victorian textile mill	Post-medieval	N
MWY1658	Market Cross Dewsbury	Post-medieval	N
MWY11709	Black Bull Public House, 11 Market Place	Post-medieval	N
MWY9300	Thorton's Rag Warehouse (demolished), Thornhill	Modern	N
MWY11417	Railway Shed at Thornhill	Post-medieval	N

- 3.3.5. There is the potential for further buried heritage remains to be present within the Proposed Scheme despite historical disturbance from development. From the review of the above data, it is likely the majority of the buried heritage remains within the site are likely to be related to the late 13th century Moot Hall / Rectory Manor extending into the south-east of the Proposed Scheme. To the north and west of the Proposed Scheme potential is likely limited to post-medieval and early modern remains related to the expansion of Dewsbury as a result of the North England textile manufacturing industry. Remains related to the Aldam Mill immediately to the west of the Proposed Scheme may extend into the west of the scheme. There is also potential for earlier remains, in particular of the medieval periods, concentrated to the south and east of the Proposed Scheme around the Church of All Saints (Dewsbury Minster) and it is likely that the church served as a focus for activity in the area during these periods. The potential extent of buried heritage remains and the impact of the Proposed Scheme would need to be determined through further assessment.

3.4

- 3.4.1. Noise Important Areas (NIAs) have been declared where the 1% of the population that are affected by the highest noise levels from major roads and railways are located. This is determined by

national modelling. There are no NIAs situated within the Site Boundary or immediately adjacent to it. There are various Road NIAs located within the Study Area, mostly around 400-450 m away from the Site Boundary. These occur along arterial roads, including along the A653 at Eastborough; along part of A638 on Wakefield Road and Halifax Road; Bradford Road (A652); and the A644⁸. These are shown on Figure A-2.

- 3.4.2. Also shown in Figure A-2 are the two Rail NIAs to the north of the site. The closest one is located approximately 600 m away.
- 3.4.3. Potential sensitive receptors in proximity to the Site Boundary include users of the local road network, users of nearby Public Rights of Way and commercial receptors near the site. There are no residential receptors located immediately adjacent to the site, however there are multiple places of worship near the Site Boundary, including Dewsbury Minster, 50 m away.

3.5

- 3.5.1. There are no European or Nationally designated sites within the Study Area (Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NRR) or Ramsar sites). The nearest designated site is 6.1 km south of the Proposed Scheme at Denby Grange Colliery SSSI and Denby Grange Colliery Ponds SAC.
- 3.5.2. There are no Local Nature Reserves (LNR), located within the Study Area. However, the nearest LNR is located 1.1km south of the Proposed Scheme, at Sparrow Wood. Additionally, these Lower Spen Wildlife Area LNR is located 1.6 km southwest of the Site Boundary. These are shown on Figure A-2.
- 3.5.3. There are no ancient woodland sites within the Study Area. There are also no trees with veteran or notable status within the Study Area.
- 3.5.4. There are no Local Wildlife Sites (LWS) located within the Study Area. However, Sparrow Wood LWS19 (3.58 ha) is located 1.1 km south of the Site Boundary and is shown in Figure A-2. Similarly, Lower Spen Wildlife Area is also an LWS and is located 1.6 km southwest of the Site Boundary.
- 3.5.5. A Preliminary Bat Roost Assessment (PBRA) survey was conducted in October 2021, and can be viewed in full in Appendix B. As a result, it was determined that trees recorded in the eastern extent of the Site Boundary are not suitable for roosting bats. However, there are roosting features for bats within the Site, which have been classified as offering roosting potential. These roosting features include the roof of a staff canteen in the south east corner of the site, with gaps behind a

⁸ Extrium (2021). England Noise and Air Quality Viewer. Available at: <http://www.extrium.co.uk/noiseviewer.html>

metal fascia and roof overhang. This building will be directly impacted by the Proposed Scheme therefore there is potential for the loss of habitat for roosting bats.

- 3.5.6. A potential roost feature (gap in the brickwork where a waste pipe exits) was recorded on the southern aspect of a building (currently vacant) adjacent to the north east of the site. A larger area of woodland which may provide more suitable roosting and foraging habitat exists off-site, directly south east, but is separated from the Site via the A638 Aldams Road. This suggests there is some limited connectivity to the Site for bats via suitable habitat.
- 3.5.7. There has been one record of a Great-Crested Newt 1.45 km northwest of the site, but no suitable waterbodies have been found within 500 m of the Site.
- 3.5.8. There is no evidence to suggest that the building on site is used by nesting birds. The ornamental and immature trees in the southeast, southwest and northwest corners of the site provide habitat suitable for nesting birds. A pair of feral pigeons were recorded nesting in a cherry tree in the south western corner of the site. Nesting opportunities on the buildings themselves are limited, although some potential may exist within the horizontal roof slats of the building to the south east of the site, however no nests were identified during the survey. Potential foraging and breeding habitat may be lost / disturbed by the Proposed Scheme if tree and vegetation clearance is required.
- 3.5.9. There are numerous areas of deciduous woodland (part of the Priority Habitat Inventory (HPI) priority habitats within the Study Area, as shown in Figure A-2). The nearest site is approximately 30 m away from the Site Boundary, located in the cemetery of Dewsbury Minster. There is also an area of Wood Pasture and Parkland HPI located approximately 1 km to the west of the site. The River Calder is also classed as Freshwater River HPI, and is located less than 0.1 km south of the Site Boundary.
- 3.5.10. Both Japanese Knotweed (*Fallopia japonica*) and Himalayan Balsam (*Impatiens glandulifera*) have been recorded at OS grid reference SE244214⁹. This is approximately 150 m south of the site along the River Calder. Giant Hogweed (*Heracleum mantegazzianum*) was also found at OS grid reference SE249212, approximately 400m south east of the Site Boundary.
- 3.5.11. It is also recommended that the landscaping provision to provide Biodiversity Net Gain (BNG) is maximised, with guidance from an ecologist. This would support Kirklees Council Local Plan Policy LP30.

⁹ National Biodiversity Network Atlas (2021) Invasive Non-Native Species Records Available at: <https://records.nbnatlas.org/> [Accessed 06/10/2021]

3.6

- 3.6.1. There are no Areas of Outstanding Natural Beauty (AONB) or National Parks within 10 km of the Site Boundary.
- 3.6.2. The Proposed Scheme is located in Dewsbury town centre, an urban area, bound by commercial properties to the north and east, and Dewsbury Police Station to the west. Aldams Road and the River Calder are to the south, with the river situated 50m away. There are no residential receptors located immediately adjacent to the site, though the nearest residential receptors are located approximately 100m north of the Proposed Scheme.
- 3.6.3. The Proposed Scheme is located within Landscape Character Area U (Urban), however it does border Landscape Character Area M1 (Industrial Lowland Valleys, Calder Valley Floor)¹⁰. This area is characterised by limited greenspace and historic industrial buildings, along the river valleys. Dewsbury Town Centre is a Conservation Area, although the Site Boundary is fully located outside of this zone. Dewsbury is within National Character Area 37: Yorkshire Southern Pennine Fringe¹¹. This area is described as *“a transitional landscape from the upland areas of the Southern Pennines NCA in the west through to the low-lying land of the Nottinghamshire, Derbyshire and Yorkshire Coalfield NCA to the east. The most striking aspect of the landscape is the mingling of predominantly ‘gritstone’ industrial towns and villages with the strong valley forms and pastoral agriculture of the Pennine foothills. The gritstone industrial buildings and settlements bring a sense of visual unity to the landscape. The landscape is dominated by industrial buildings and structures such as factories, chimneys, railways and canals. The NCA is characterised by steep slopes that are cut through by narrow rivers, which open up into valleys on lower land. The river corridors provide links through the NCA from the uplands into the towns and cities in the valleys, supplying not only water for the large population in these areas but also opportunities for people to access and enjoy the natural environment and for species movement through the landscape.”*
- 3.6.4. There are very few areas of green space such as woodland, agricultural land in close proximity to the Site Boundary, with only a few isolated areas along the river and a cemetery next to Dewsbury Minster. The nearest open space is 550 m to the east, near Mount Pleasant. There are no outdoor recreational sports and park grounds adjacent to the Site Boundary
- 3.6.5. The Site Boundary is not directly adjacent to any Greenbelt designations, however there are two designations within the Study Area. These include the Liverpool, Manchester and West Yorkshire Greenbelt (Kirklees District) approximately 700 m to the north east; and the Liverpool, Manchester and West Yorkshire Greenbelt (Wakefield) 760 m to the south east.

¹⁰LUC (2015) Kirklees District Landscape Character Assessment. Available at: <https://www.kirklees.gov.uk/beta/planning-policy/pdf/supportingDocuments/climateChange/Kirklees-Landscape-Character-2015.pdf>. [Accessed 26/09/2021]

¹¹ Natural England (2013) National Character Area Profiles. Available at: <http://publications.naturalengland.org.uk/publication/5459581769613312?category=587130> [Accessed 13/10/2021]

- 3.6.6. There are no Public Rights of Way (PRoW) directly adjacent to the Site Boundary. The closest PRoWs are located along the River Calder approximately 50 m away, and there are numerous PRoWs further north in the Eastborough area.

3.7

An Arboricultural Impact Assessment (AIA) has been produced, which details the results of the site Arboricultural Survey and includes an Arboricultural Method Statement (see Appendix C). It was found that there are no Tree Protection Orders (TPOs) located within the Site Boundary. Dewsbury Town Centre Conservation Area is located 50 m to the north, although the Site Boundary is fully located outside of this zone. There are no ancient woodlands, or notable / veteran trees within 15m of the Site Boundary. A site walkover determined that there were 17 trees within the site, 11 of moderate quality, five of low quality and one that is not worthy of retention.

3.8

- 3.8.1. There are four historic landfill sites which lie within the Study Area (see Figure A-2). The nearest is 600 m to the north, near Batley Carr, whilst the others are to the south of the Site Boundary.
- 3.8.2. There is one regionally important geological site within the Study Area. Known as Caulms Wood Quarry, it is located approximately 750 m north of the site (OS reference: SE 250 223).¹² Spatial data on this site is limited therefore it has not been included in Figure A-2 in Appendix A.
- 3.8.3. The Site Boundary lies within both bedrock and a superficial (drift) aquifers¹³. Both of these aquifers are type Secondary A, meaning they support local water supplies and can sometimes form important sources of river baseflow.
- 3.8.4. The site is located within a Coal Mining Reporting Area¹⁴. There are no mine entrances or high-risk development areas located within the Study Area.

¹² West Yorkshire Geology Trust (2008) West Yorkshire Geodiversity Action Plan. Available at: <http://www.wyorkshiregeologytrust.org/misc/Draft%20WYGAP.pdf> [Accessed: 22/09/21].

¹³ Bedrock aquifers are solid permeable formations such as sandstone or chalk, whilst superficial (drift) aquifers are made of permeable unconsolidated deposits such as sand or gravel.

¹⁴ The Coal Authority (2021) Interactive map. Available at: <http://mapapps2.bgs.ac.uk/coalauthority/home.html> [Accessed: 22/09/21]

- 3.8.5. The bedrock geology within the Study Area is sandstone to the north west (the formation is known as Emley Rock). The south east part of the Site Boundary lies on the Pennine Lower Coal Measures Formation. The bedrock here consists of mudstone, siltstone and sandstone¹⁵.
- 3.8.6. Superficial deposits within the Study Area are formed of alluvium, which consists of clay, sand, silt and gravels from river deposits that occurred 2 million years ago.

3.9

- 3.9.1. Within the Study Area the main water body is the River Calder, which lies 50 m south of the Site Boundary. Batley Beck lies approximately 240 m to the east of the Site Boundary. These are both classed as Statutory Main Rivers.
- 3.9.2. In terms of water quality, the River Calder was given a 'moderate' classification in 2019, in line with the Water Framework Directive objectives. It achieved 'moderate' ecological status and a 'fail' in chemical status. Batley Beck also achieved overall 'moderate' status in 2019, with 'moderate' ecological status and a 'fail' in chemical status.
- 3.9.3. The southern side of the Site Boundary is in Flood Risk Zone 2 (an area with between 1 in 100 and 1 in 1,000 annual probability of river flooding). There are areas that are in Flood Risk Zone 3 (an area with great than 1 in 100 annual probability of river flooding) within 50 m of the Site Boundary. These flood zones are shown in Appendix A, Figure A-2.
- 3.9.4. There are no source protection zones within the Study Area. The nearest protection zone is approximately 5 km east of the site.

3.10

- 3.10.1. There are no Public Rights of Way (PRoW) directly adjacent to the Site Boundary. However, within the Study Area there are two PRoWs along the River Calder approximately 50 m away, and there are numerous PRoWs further north in the Eastborough area.
- 3.10.2. There are no Sustrans routes within the Site Boundary. Within the Study Area is route number 69, 50 m to the north. This runs north along Old Westgate and Daisy Hill and then turns south along Long Causeway (130 m away from the Site Boundary), as shown in Appendix A, Figure A-2.
- 3.10.3. There are no nurseries, primary schools or secondary schools immediately adjacent to the Site Boundary. Within the Study Area, there are 11 educational establishments. There are three Infant

¹⁵ British Geological Survey (2021) Geology of Britain Viewer. Available at: <http://mapapps.bgs.ac.uk/geologyofbritain/home.html> [Accessed: 22/09/21].

and Nursery Schools, two Primary Schools, two Secondary Schools, one Children's Centres and two schools for 2-16 year olds. Of these, the nearest is the Flatts and Eastborough Children's Centre, which is 140 m north of the Site Boundary.

- 3.10.4. There are nine GP surgeries located within the Study Area. Of these, the closest is located approximately 150 m west of the site. There are six dentists located within the Study Area, the nearest being the Baker and Rigby Dental Surgery, 60 m north of the site.
- 3.10.5. In terms of community facilities, Dewsbury Sports Centre is located 125 m east of the Site Boundary, whilst Dewsbury Library is 230 m east. There is a police station immediately adjacent to the western edge of the Site Boundary.
- 3.10.6. There are 20 places of worship within the Study Area. Of these, 10 are churches, the nearest being Dewsbury Minster, which is 50 m east of the site. There are 10 mosques within the Study Area. Of these, the nearest is the Makki Madani Masjid which is 400 m south of the site.

3.11

- 3.11.1. In January 2019, Kirklees Council declared a Climate Emergency and has begun working on a plan to deliver carbon reductions across the district¹⁶. Kirklees Council's vision is to be carbon neutral by 2038, and an action plan with detailed targets is currently in development. Summary goals are set out in Phase 1 of the carbon neutral vision:
 - Set a carbon budget;
 - Increase the amount of electric vehicle charging points;
 - All low and ultra-low emission cars park for free in Kirklees for free;
 - Add more electric vehicles to the Kirklees Council fleet;
 - Consider environmental impacts in all decisions;
 - Plant more trees;
 - Create a Kirklees Climate Commission and Kirklees Green Charter;
 - Host a Kirklees Youth summit; and
 - Increase the recycling rate.
- 3.11.2. Carbon dioxide (CO₂) is the main greenhouse gas that is widely held to be responsible for recent changes in our climate. In West Yorkshire, 2020 figures for carbon emissions show that transport contributed 4.9 MtCO₂e/yr., 44% of the overall emissions for the area¹⁷. Estimates of CO₂ emissions

¹⁶ Kirklees Council (2019) Climate Emergency. Available at: <https://www.kirklees.gov.uk/beta/climate-emergency/index.aspx>. [Accessed 23/09/2021]

¹⁷ Element Energy (2020) *West Yorkshire Carbon Emissions Reduction Pathways* Available at: <https://www.westyorks-ca.gov.uk/media/4277/west-yorkshire-carbon-emission-reduction-pathways-technical-report-draft-v7-1.pdf> [Accessed 23/09/21]

for Kirklees suggest that transport accounts for 664.2 kilotons (34.7%) of the total CO₂ emissions in 2018¹⁸ (latest available data).

- 3.11.3. Recent research from the Tyndall Centre has estimated the carbon budget for Kirklees to be 11.9 million tonnes (MtCO₂) for the period of 2020 to 2100. Using 2017 CO₂ emission levels, Kirklees would use this entire budget by 2027¹⁹.
- 3.11.4. The UK Climate Projections²⁰ provide a range of data detailing the future predictions of temperature and rainfall over the next century across global, regional and local scales. Using the UK Probabilistic Projections, a high emission scenario in the UK showed that across central England:
 - Summer temperatures could be up to 5.8°C hotter by 2070, while winters could be up to 4.2°C warmer;
 - Hot summers are predicted to become more common, with the chances of a summer heatwave as hot as that of 2018 around 50% by the middle of this century.
 - Average summer rainfall could decrease by up to 57% by 2070, while there could be up to 33% more precipitation in winter.
- 3.11.5. Risk of flooding is an issue noted in the Kirklees Local Plan Strategy and Policies²¹ (see 3.9 for flood risk details). The Kirklees Council objectives are to improve greenspaces supporting residents, habitats and wildlife; promote developments that help mitigate climate change; and to protect and enhance the characteristics of the built, natural and historic environment.

¹⁸ National Statistics (2020) *2005 to 2018 UK Local and Regional Carbon Dioxide Emissions – data tables*. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018> [accessed 08/12/2020].

¹⁹ Kuriakose, J., Jones, C., Anderson, K., Broderick, J., McLachlan, C. (2021) *Setting Climate Commitments for Kirklees*. Available at: <https://carbonbudget.manchester.ac.uk/reports/E08000034/> [Accessed 23/09/21]

²⁰ Met Office (2021) *UKCP18 Climate Change Over Land*. Available at: <https://www.metoffice.gov.uk/binaries/content/assets/metofficegovuk/pdf/research/ukcp/ukcp18-infographic-headline-findings-land.pdf> [accessed 23/09/2021].

²¹ Kirklees Council (2019) *Kirklees Local Plan Strategy and Policies*. Available at: <https://www.kirklees.gov.uk/beta/planning-policy/pdf/local-plan-strategy-and-policies.pdf>. [Accessed 13/01/2021]

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- 4.1.1. This section highlights the key issues and planning policies relevant to the proposed works, and to advise on the actions required during the design process to ensure that the planning balance of any future development would be in favour of approval.
 - 4.1.2. of this document considers the possible consenting routes that WYCA could follow to secure the necessary permissions for the construction and operation of the Proposed Scheme.

4.2

- 4.2.1. The National Planning Policy Framework 2021 ('NPPF') provides a framework for the designation of local plans by local authorities and for the consideration of planning applications in England. At the heart of the NPPF is "**a presumption in favour of sustainable development**". In terms of plan-making, this presumption instructs local authorities to "*promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects*". For decision-taking, the presumption means that development proposals according with an up-to-date development plan should be approved without delay.
 - 4.2.2. Paragraph 11 sets out that plans and decisions should apply a presumption in favour of sustainable development.
 - 4.2.3. The Proposed Scheme seeks to prioritise the use of sustainable modes of transport, i.e. bus, and reduce reliance on the private car. Therefore, it is considered to enable a sustainable pattern of development.
 - 4.2.4. Paragraph 16 (c) of the NPPF confirms that Local Plans should be "*shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees*".
 - 4.2.5. Paragraph 104 (c) of the NPPF supports the consideration of sustainable transport "*from the earliest stages of plan-making and development proposals, so that: opportunities to promote walking, cycling and public transport use are identified and pursued.*"
 - 4.2.6. Paragraph 110 of the NPPF sets out the promotion of sustainable transport when considering development proposals. It states that, "*In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that: (a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location [and] (c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.*"
 - 4.2.7. Paragraph 111 of the NPPF states that, "*development should only be refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.*"
 - 4.2.8. Paragraph 112 of the NPPF states that, "*development should (a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the*
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catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; (b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; (c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.”

- 4.2.9. The proposed scheme has the potential to take up an opportunity to promote bus travel as a preferred transport mode while creating a place that is safe, secure and attractive, and ensuring appropriate mitigation in line with applicable guidance where any potential impacts are identified.
- 4.2.10. Paragraph 153 of the NPPF encourages, *“a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.”*
- 4.2.11. The proposed works has the potential to offer benefits in terms of climate change resilience by improving sustainable transport links in the form of a modernised bus station.
- 4.2.12. Paragraph 174 (e) of the NPPF states that, *“Planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality...”*
- 4.2.13. Any environmental designations or potential impacts are set out above in Section 3.
- 4.2.14. Paragraph 186 of the NPPF states that, *“Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.”*
- 4.2.15. There are no Air Quality Management Areas (AQMA) within the Site Boundary, however there is one located within 1 km of the Proposed Scheme.
- 4.2.16. There is one Air Quality Monitoring Site within the Site Boundary. NO₂ concentrations were measured at 41.00 µg/m³ in 2019 and have declined by 14% since 2016. Despite the decline, the concentrations exceed the UK annual mean objective of 40 µg/m³.
- 4.2.17. Paragraph 201 of the NPPF states that *“where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss”*.

- 4.2.18. The southern extent of Dewsbury Town Centre Conservation Area lies approximately 70m north of the Dewsbury Bus Station site.

4.3

- 4.3.1. The adopted Development Plan comprises two parts:

- Kirklees Local Plan Strategy and Policies, Adopted 27 February 2019; and
- Kirklees Local Plan Allocations and Designations, Adopted 27 February 2019.

- 4.3.2. The Kirklees Local Plan Strategy and Policies (KLPS) covers a period from 2013-2031. It sets out the spatial strategy and development management policies for KC.

- 4.3.3. Its strategic objectives summarise the measures needed to deliver the vision that, *“In 2031, Kirklees will be a great place to live, work and invest in, delivered through an integrated approach to housing and employment. Development will have taken place in a sustainable way (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. Health inequalities will have been reduced, enabling higher standards of health and well-being resulting from improved access to training and job opportunities, a decent and affordable home, access to services and green spaces and opportunities for physical activity and a healthy lifestyle.”*

- 4.3.4. The Strategic Objectives are set out in , below.

	Support the growth and diversification of the economy, to increase skill levels and employment opportunities including the provision of a high quality communication infrastructure.
	Strengthen the role of town centres, particularly Huddersfield, Dewsbury and Batley, to support their vitality and viability
	Improve transport links within and between Kirklees towns and with neighbouring towns and cities, giving priority to public transport, and to cycling and walking, providing an efficient highway network which supports the district's economy.
	Provide new homes which meet the housing needs of the community offering a range of size, tenure and affordability, support existing communities and access to employment, public transport, shops and services.
	Tackle inequality and give all residents the opportunity of a healthy lifestyle, free from crime and to achieve their potential in work and education.
	Protect and improve green infrastructure to support health and well-being, giving residents access to good quality open spaces, sport and recreation opportunities, and to support habitats, allowing wildlife to flourish.
	Promote development that helps to reduce and mitigate climate change, and development which is adapted so that the potential impact from climate change is reduced and to help the transition towards a low carbon economy.
	Protect and enhance the characteristics of the built, natural and historic environment, and local distinctiveness which contribute to the character of Kirklees, including the South Pennine Moors, Moorland fringe and the area's industrial heritage.

	Promote the re-use of existing buildings and the use of brownfield land to meet development needs and support the regeneration of areas.
	Facilitate the sustainable use and management of minerals and waste.

4.3.5. The policies of the KLPSP considered relevant to the Proposed Scheme are:

- Policy LP2: Place Shaping – Dewsbury and Mirfield;
- Policy LP13: Town Centre Uses;
- Policy LP18: Dewsbury Town Centre;
- Section 10: Transport
 - Policy LP19: Strategic Transport Infrastructure;
 - Policy LP20: Sustainable Travel;
 - Policy LP21: Highways and Access;
- Policy LP24: Design;
- Policy LP30: Biodiversity and Development
- Policy LP33: Trees;
- Policy LP35: Historic environment; and
- Policy LP47: Healthy, active and safe lifestyles.

4.3.6. Policy LP2 states that, *“All development proposals should seek to build on the strengths, opportunities and help address challenges identified in the Local Plan, in order to protect and enhance the qualities which contribute to the character of these places”*.

4.3.7. Among the strengths/opportunities for growth, the Policy states that, *“Dewsbury is an important public transport hub with bus services linking to other parts of North Kirklees and to Leeds, Bradford and Wakefield”*, and that there is *“Priority in Kirklees Economic Strategy to transform Dewsbury, building on strategic location and driven by integrated housing and economic development in town centre”*.

4.3.8. Among the challenges to growth, the Policy lists *“Traffic congestion on key routes”*, and *“Dewsbury town centre Conservation Area is on the Heritage at Risk register”*.

4.3.9. The Proposed Scheme represents an opportunity to improve bus services in Dewsbury town centre. It is considered that the Proposed Scheme will assist KC objectives by providing enhanced bus facilities, which can alleviate traffic congestion by providing alternative travel options for key routes in and around Dewsbury town centre.

4.3.10. The Proposed Scheme design should also recognise the designation of Dewsbury Town Centre CA.

4.3.11. Policy LP13 lists Dewsbury as a Principal Town Centre and states that, *“All proposals shall be inclusive for all users, and be attractive to pedestrians, cyclists, and public transport users”*.

4.3.12. Policy LP18 sets out the requirements for proposals within the town centre of Dewsbury. This reiterates the desire that proposals shall make the area *“more attractive to pedestrians, cyclists and public transport users”*.

4.3.13. The Proposed Scheme is designed to be attractive to people using public transport in Dewsbury town centre.

- 4.3.14. Section 10 of the KLPSP document sets out a number of Policies (listed above under Paragraph 4.3.5) that acknowledge the importance of sustainable transport schemes, including those that improve infrastructure for people using public transport.
- 4.3.15. Notably, Policy LP20 on Sustainable Travel sets out the user hierarchy required to be facilitated by proposals:
- a. *Pedestrians*
 - b. *Cyclists*
 - c. *Public transport*
 - d. *Private vehicles*
- 4.3.16. The Proposed Scheme will provide improvements for people taking the bus to or from the town centre, improving connectivity with the local area and wider region, and providing a safer network for sustainable travel modes.
- 4.3.17. Policy LP24 states that, *“Proposals 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.*
 - d. *high levels of sustainability, to a degree proportionate to the proposal, through:*
 - viii. *designing places that are adaptable and able to respond to change, with consideration given to accommodating services and infrastructure, access to high quality public transport facilities and offer flexibility to meet changing requirements of the resident / user.*
- 4.3.18. The Proposed Scheme is considered to help enable this objective by providing improvements to the bus station facilities to support sustainable journeys to, from and around the town centre.
- 4.3.19. Policy LP30 requires that development applications should not result in loss or harm to biodiversity, minimise its impact, and provide biodiversity net gains where appropriate.
- 4.3.20. Policy LP33 states that *“Proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment”*.
- 4.3.21. The Proposed Scheme is supported by an AIA, which advises that 5 No. trees would require removal. The proposed design features additional areas of soft landscaping, including native tree planting which can improve the quality and diversity of trees. This will be used to achieve biodiversity net gain and enhance the existing layout. Appropriate methods of avoidance, mitigation, compensation and enhancement will be detailed in the full planning submission. This pre-application will be used to establish the degree of BNG required.

- recognises the importance of heritage assets and Conservation Areas in Kirklees in order to protect and enhance their significance.
- The Proposed Scheme is to provide enhanced bus facilities to support sustainable transport in and around Dewsbury town centre. Detailed designs should consider the context of the town and Conservation Areas.
- It is noted that, “The council will, with its partners, create an environment which supports sustainable transport and safe communities and reduces inequality [including by] increasing opportunities for sustainable travel and encouraging more sustainable travel choices”.
- The Scheme aims to improve the safety of public transport infrastructure in Dewsbury town centre. It will therefore assist with the above objective by increasing opportunities for more sustainable travel choices.
- The Local Plan Allocations and Designations (KLPAD) covers the period 2013 to 2031. The KLPAD sets out the main allocations and designations, subdivided into categories and areas, including the following:
- The KLPAD provides details of the transport schemes identified under Policy LP19 within the context of the KLPSP.
 - The KLPAD sets out a number of measures to be implemented across the area. The KLPAD states the aim for, “Area wide and corridor highway, public transport, cyclist and pedestrian improvements to address local congestion issues.”
 - The proposed measures could, “‘Kick-start’ the transformative change of the urban centre by encouraging investment and inward migration into the local area. [...] An improved public transport provision along the key route network will reduce the impact on air quality caused by overuse of the private car.”
- The Development aims to achieve an improvement to bus infrastructure provision to support the needs of the wider network.
- The Development states that its “bus element is targeted at reducing costs by speeding up journey times.”
- The Development aims to achieve an improvement to bus infrastructure provision to support the needs of the wider network.

5.1

- 5.1.1. It is anticipated that certain elements of the Proposed Scheme could be delivered either under Section 55 of the Town and Country Planning Act (TCPA) 1990 or as Permitted Development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) (GPDO) ('the Order'), dependant on whether the LPA consider the Proposed Scheme to have significant adverse environmental effects. These elements are as follows:
- Refurbishment of the internal and external elements of the bus station;
 - Strengthening signage and wayfinding to improve integration and accessibility;
 - Reconfiguration of the bus apron area to improve safety and efficiency;
 - Possible green route through the site to improve pedestrian linkages; and
 - Integration with Kirklees Aldams Road and South Street proposals.
- 5.1.2. The remaining elements of the Proposed Scheme (i.e. Building entrance improvements including glazing and a proposed atrium area to improve the sense of place, external building cladding, landscaping and boundary treatments, contractor parking with an EV charging point, and sustainability improvements to contribute to carbon reduction and energy efficiency) would be delivered via a full planning application under the TCPA 1990. This process is set out under Section 5.3.
- 5.1.3. If any elements of the Proposed Scheme have the potential for significant adverse environmental effects, then the LPA – KC – may consider that the works comprise EIA development in accordance with the Town and Country Planning (EIA) Regulations 2017.
- 5.1.4. Therefore, it is proposed to request that KC adopts a Screening Opinion in relation to the Proposed Scheme. This process is set out under Section 5.2.
- 5.1.5. If KC considers that the works comprise EIA development, then a planning application would be required as stated under Section 3(10) of the GPDO (explained further in Paragraph 5.1.31), which would be prepared as set out in Section 5.3. In this scenario, an EIA would be submitted for the whole scheme.
- 5.1.6. If KC considers that the works do not comprise EIA development, then certain elements of the Proposed Scheme could be delivered either under Section 55 of the TCPA or as Permitted Development, as stated in Paragraph 5.1.1, and the remaining elements of the Proposed Scheme would be delivered via a full planning application under the TCPA 1990, as stated in Paragraph 5.1.2. These routes are set out in further detail below. This approach would be agreed with the LPA prior to proceeding.
- 5.1.7. The Town and Country Planning Act (TCPA) 1990 provides the legislative framework for the planning system in the UK. The TCPA defines development, details the requirement for planning permission for development and sets out how applications should be made, and decisions taken. Although subsequent legislation has amended and updated it, the TCPA is still considered the 'principal act'.

- 5.1.8. Section 55 of the TCPA 1990 identifies the meaning of ‘development’ – i.e. works that require planning permission – as *‘the carrying out of building, engineering, mining or other operations in, on, over or under land, or the making of any material change in the use of any buildings or other land’*.
- 5.1.9. It is clarified by Section 55 (1A)(c) that this includes *‘structural alterations of or additions to buildings’*.
- 5.1.10. It is considered that the following elements of the Proposed Scheme comprise development under the definition set out above, and therefore require a full planning application:
- Building entrance improvements including glazing and a proposed atrium area to improve the sense of place;
 - External building cladding;
 - Landscaping and boundary improvements (see [redacted]); and
 - Contractor parking with an EV charging point.
- 5.1.11. Other important legislation for the operation of the planning system includes (but is not limited to):
- The Planning and Compulsory Purchase Act 2004;
 - The Town and Country Planning (General Permitted Development) Order 2015;
 - The Town and County Planning (Development Management Procedure) (England) Order 2015; and
 - The Town and County Planning (Environment Impact Assessment) Regulations 2017.
- 5.1.12. Section 70(2) of the TCPA 1990 and Section 38(6) of the Planning and Compulsory Purchase Act (2004) require planning applications to be determined in accordance with the Local Development Plan, unless material considerations indicate otherwise. The relevant Local Development Plan policies for the Proposed Scheme is set out in [redacted] of this report.
- 5.1.13. Section 55 Clause (2) of the TCPA 1990 sets out the certain operations or uses of land that *‘shall not be taken for the purpose of this Act to involve development of the land’*, and hence not require planning permission. Part (b) specifically states:
- (b) the carrying out for the maintenance, improvement or other alteration of any building of works which—*
- (i) affect only the interior of the building, or*
 - (ii) do not materially affect the external appearance of the building*
- 5.1.14. Under this Clause, the works that involve the carrying out of refurbishments to the internal concourse of the bus station do not comprise ‘development’ requiring planning permission, subject to the criteria defined in Section 55 of the TCPA 1990.
- 5.1.15. It is considered that a number of the elements of the Proposed Scheme can be carried out under Permitted Development and as such do not require a specific planning permission. Details of the applicable Parts of Schedule 2 of the GPDO are set out below.
- 5.1.16. Part 9 Class C(c) of the GPDO permits:

C. Development required for the purposes of the carrying on of any tramway or road transport undertaking consisting of—

(c) the installation of telephone cables and apparatus, huts, stop posts and signs required in connection with the operation of public service vehicles.

5.1.17. It is considered that the works that involve the strengthening of signage and wayfinding is included under this Part of the GPDO.

5.1.18. Part 9 Class C(e) of the GPDO permits:

C. Development required for the purposes of the carrying on of any tramway or road transport undertaking consisting of—

(e) any other development on operational land of the undertaking.

5.1.19. It is considered that the works that involve the reconfiguration of the bus apron area is included under this Part of the GPDO.

5.1.20. Part 14 Class J(c) of the GPDO permits:

J. The installation, alteration or replacement of—

(c) other solar PV equipment on the roof of a building, other than a dwelling house or a block of flats.

5.1.21. It is considered that the works that involve the sustainability improvements – i.e. the roof mounted solar PV panels – is included under this Part of the GPDO.

5.1.22. However, the following Condition is attached to this Permitted Development:

J.4—(2) Class J(c) development is permitted subject to the condition that before beginning the development the developer must apply to the local planning authority for a determination as to whether the prior approval of the authority will be required as to the design or external appearance of the development, in particular the impact of glare on occupiers of neighbouring land.

5.1.23. Therefore, if a Permitted Development approach is to be pursued for this element of the works, then the developer must apply to the LPA for a determination as to whether the prior approval of the authority will be required. Details of the requirements of the prior approval application are set out in the subsequent paragraphs of the Class J.4 – (3) to (11), inclusive.

5.1.24. However, given that a planning application is required to be prepared for the building entrance improvements and landscaping and boundary treatments, it is considered that the best approach would be to include the sustainability improvements within the same planning application. This approach is described further in .

5.1.25. Part 9 Class C(e) of the GPDO permits:

C. Development required for the purposes of the carrying on of any tramway or road transport undertaking consisting of—

(e) any other development on operational land of the undertaking.

- 5.1.26. It is considered that the works that involve the possible green route through the site is included under this Part of the GPDO.
- 5.1.27. Part 9 Class C(e) of the GPDO permits:
- C. Development required for the purposes of the carrying on of any tramway or road transport undertaking consisting of—*
- (e) any other development on operational land of the undertaking.*
- 5.1.28. It is understood that the South Street and Aldams Road works comprise highways improvements to be undertaken as elements of a separate proposal to the Dewsbury Bus Station Proposed Scheme. The works to integrate the Dewsbury Bus Station Proposed Scheme with the South Street and Aldams Road proposals would comprise junction improvements within the boundary of the Proposed Scheme. Therefore, it is considered that the works that involve the integration with South Street and Aldams Road proposals is included under the abovementioned Part of the GPDO.
- 5.1.29. Part 2 Class A of the GPDO permits:
- A. The erection, construction, maintenance, improvement or alteration of a gate, fence, wall or other means of enclosure.*
- 5.1.30. However, under GPDO Part 2 Class A(a)(ii) the erection of a fence is not permitted if the height of any fence erected adjacent to a highway used by vehicular traffic would, after the carrying out of development, exceed 1 metre above ground level. The proposed paladin fence along the southern boundary would be 2.4 metres in height, so would not fall within Permitted Development.
- 5.1.31. As set out by Section 3(10) of the GPDO, development listed within Schedule 1 or Schedule 2 of the applicable EIA Regulations (in this case, Town and Country Planning (EIA) Regulations 2017) does not benefit from being considered Permitted Development unless the Local Planning Authority (LPA) has adopted a screening opinion to the effect that an EIA is not required. If EIA is required, full planning permission is required. Further information relating to EIA Screening is provided in
- 5.1.32. The Order removes the need to apply for express planning permission for specific works. However, proposed developments would still need to comply with other regulations and consenting regimes. Depending on the specific design and location of each package of works, other consents that may be required include Planning Permission for relevant demolition within a conservation area; Listed Building Consent; consent for works to Trees (both trees protected by Tree Preservation Orders and trees within Conservation Areas) and Highway Permissions.

5.2

- 5.2.1. The applicable EIA regime for the proposed works is the Town and Country Planning (EIA) Regulations 2017 (SI 2017/57) (hereafter referred to as the 'EIA Regulations').

- 5.2.2. Elements of the proposed works are considered to fall within the definitions of development set out in Schedule 2 of the EIA Regulations, as follows:
- Part 10 Infrastructure Projects (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas; and
 - Part 13 Change and extensions (b) Any change to or extension of development of a description listed in Paragraphs 1 to 12 of column 1 of the table in Schedule 2, where that development is already authorised, executed or in the process of being executed.
- 5.2.3. If development is of a type described in Schedule 2, EIA Screening will be required if one of the following applies:
- Any part of the development is to be carried out in a sensitive area (as defined in the EIA Regulations); and
 - Any threshold or criteria specified in Schedule 2 is exceeded or met.
- 5.2.4. Through a review of the environmental constraints and potential impacts, as outlined in of this report, it is considered that the Proposed Scheme does not fall within any sensitive areas as defined in the EIA Regulations. The sensitive areas defined by the EIA Regulations are as follows:
- Sites of Special Scientific Interest (SSSI);
 - A National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
 - The Broads;
 - World Heritage Sites;
 - Scheduled monuments;
 - Areas of Outstanding Natural Beauty (AONB); and
 - European sites.
- 5.2.5. The applicable criteria specified in Schedule 2 for 10(b) and 13(b) are as follows:
- 10(b) –
 - (i) The development includes more than 1 hectare of urban development which is not dwelling house development; or
 - (ii) The development includes more than 150 dwellings; or
 - (iii) The overall area of the development exceeds 5 hectares.
 - 13(b) – Either:
 - (i) The development as changed or extended may have significant adverse impacts on the environment; or
 - (ii) in relation to development of a description mentioned in Column 1 of the table in Schedule 2, the thresholds and criteria in the corresponding part of Column 2 of the table applied to the change or extension are met or exceeded.
- 5.2.6. Therefore, it is considered that any ‘development’ (definition of which relates to a project as discussed in) taken forward that exceeds a threshold of 1 hectare of urban development or exceeds a threshold of 5 hectares of overall area or may have significant effects on the environment will require EIA Screening.

- 5.2.7. In accordance with the EIA Regulations, a person may request the relevant LPA to adopt a screening opinion.
- 5.2.8. When making a request for a screening opinion the following must be provided:
- A plan sufficient to identify the land.
 - A description of the development, including in particular a description of the:
 - physical characteristics of the development and, where relevant, of demolition works; and
 - location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected.
 - A description of the aspects of the environment likely to be significantly affected by the development.
 - To the extent the information is available, a description of any likely significant effects of the proposed development on the environment resulting from:
 - the expected residues and emissions and the production of waste, where relevant; and
 - the use of natural resources, in particular soil, land, water and biodiversity.
 - Such other information or representations as the person making the request may wish to provide or make, including any features of the proposed development or any measures envisaged to avoid or prevent what might otherwise have been significant adverse effects on the environment.
- 5.2.9. The EIA Regulations also require that the person compiling the above information must, where relevant, take into account (a) the criteria set out in Schedule 3, and (b) the results of any relevant EU environmental assessment which are reasonably available to the person requesting the screening opinion.
- 5.2.10. The criteria set out in Schedule 3 are as follows:
- Characteristics of development;
 - Location of development; and
 - Types and characteristics of the potential impact.
- 5.2.11. Schedule 3 of the EIA Regulations also specifies that the impact of the development together with other developments (cumulative impacts) must be considered during screening.
- 5.2.12. On receipt of a request for an EIA screening opinion, the LPA must adopt a screening opinion within:
- Three weeks beginning with the date of receipt of a request made pursuant to Paragraph (1); or
 - Such longer period as may be agreed in writing with the person making the request, not exceeding 90 days from the date on which the person making the request submits the information required.
- 5.2.13. After the LPA has made a decision, it must send a copy of the screening opinion to the person who has requested it (regulation 6(6) of the EIA Regulations).
- 5.2.14. The Secretary of State has, under the EIA Regulations, the ability to make a screening direction different to that adopted by the local planning authority.

- 5.2.15. Relevant to the consideration of the consenting route (i.e. if the works are identified as 'development' in the TCPA 1990, or if they are considered to have a significant adverse environmental effect, can Permitted Development rights apply to elements of the scheme) is how a development should be defined for the purpose of EIA.
- 5.2.16. Planning practice guidance states that '*An application should not be considered in isolation if, in reality, it is an integral part of a more substantial development (Judgment in the case of R v Swale BC ex parte RSPB [1991] 1PLR 6). In such cases, the need for Environmental Impact Assessment must be considered in the context of the whole development. In other cases, it is appropriate to establish whether each of the proposed developments could proceed independently (R (Candlish) v Hastings Borough Council [2005] All ER (D) 178 (Jul); Baker v Bath & North East Somerset Council [2009] All ER (D) 169 (Jul))*²².
- 5.2.17. The question of what comprises a 'project' or 'development' for the purpose of EIA Screening has further been developed through case law.

5.3

- 5.3.1. Under Section 70 of the Town and Country Planning Act 1990 and Section 38 of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the Local Development Plan, unless material considerations indicate otherwise.
- 5.3.2. There is no defined list of what constitutes a material consideration. For a matter to be considered material it should serve or be related to the purpose of planning and should fairly and reasonably be related to the particular application. Material considerations can include Government policy and guidance (e.g. NPPF), emerging Local Plan policies, Supplementary Planning Guidance, views of statutory consultees, visual appearance of the a given development, environmental impacts (air quality, nature conservation, historic environment, townscape, noise, contamination, odour etc.), the needs of an area and the wider economic benefits.
- 5.3.3. A planning application will need to demonstrate how the relevant elements (i.e. those not covered under the GPDO) of the Proposed Scheme accords with the requirements of the Local Development Plan and how it addresses matters that may be considered material considerations. Matters that an application and its supporting documents may need to consider will vary dependant on two scenarios:
 - Development does not meet the requirements of the Order, but is determined not to be EIA Development – standalone assessments (e.g. a Heritage Statement, Arboricultural Impact Assessment) may be determined to be required through consultation with Kirklees Council; and
 - Development is determined to be EIA Development – an Environmental Statement (ES) compliant with the EIA Regulations is required to be submitted in support of a planning

²² Department of Communities and Local Government, Planning Practice Guidance [Online] Paragraph 025 (ID: ID: 4-025-20170728)

application. The scope of the ES would be determined through EIA Scoping to ensure it is proportionate.

- 5.3.4. If development is determined to be EIA Development and therefore requires submission of an ES with a planning application, an extended programme both pre- and post-application is likely to be required. Time required to undertake the stages of EIA (i.e. EIA Scoping and preparation of an ES) and consult appropriately will likely lead to a more extended pre-application programme. Furthermore, post-submission a 13-week determination time period applies to applications for major development ('non-EIA'), while a 16-week determination applies to development subject to EIA.

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- 6.1.1. This section considers the possible consenting routes that WYCA could follow to secure the necessary permissions for the construction and operation of the Proposed Scheme.
- 6.1.2. It is considered that the refurbishment of the bus station building to a higher standard (internal concourse) does not comprise ‘development’ requiring planning permission, subject to the criteria defined in Section 55 of the TCPA 1990 (see).
- 6.1.3. The following works could potentially be carried out under Permitted Development Rights:
- Strengthening signage and wayfinding to improve integration and accessibility
 - Reconfiguration of the bus apron area to improve safety and efficiency
 - Improved pedestrian linkages through the bus station
 - Integration with Kirklees Aldams Road and South Street proposals
- 6.1.4. However, the following works would require planning permission:
- Building entrance improvements including glazing and a proposed atrium area to improve the sense of place;
 - External building cladding;
 - Sustainability improvements to contribute to carbon reduction and energy efficiency;
 - Landscaping and boundary improvements; and
 - Contractor parking with an EV charging point.
- 6.1.5. It is proposed that the most efficient route to achieve planning consent for this would be to submit a full planning and associated consents application covering the applicable elements of the Proposed Scheme for approval by the LPA (KC).
- 6.1.6. Under the above approach, the remaining elements of the Proposed Scheme would be considered to fall under Permitted Development. These are listed above in .
- 6.1.7. It is recommended that dialogue be opened with the LPA at the earliest opportunity to discuss design outcomes and the approach set out above.
- 6.1.8. Regarding the proposed removal of 5 No. trees as set out in the AIA report, it is considered that the local authority is permitted to undertake this work “*in the interests of the safe operation of the undertaking*” (see).
- 6.1.9. Other consents may be required where necessary. These consents may include, for example, Listed Building consent.
- 6.1.10. If any of the works affect a Listed Building or structure within its curtilage in a way that will change its character, then Listed Building Consent would be required.

6.2

- 6.2.1. The Proposed Scheme currently exceeds the 1-hectare threshold for urban development as outlined within 10(b) of Schedule 2 of the EIA Regulations 2017. As such, the potential for significant impacts is required to be considered.
- 6.2.2. It is intended that an EIA Screening Opinion request will be submitted for all works of the Proposed Scheme.

- 6.2.3. Sufficient certainty on the extent of the Scheme Boundary as well as the nature of the Proposed Scheme will be required prior to the submission of an EIA Screening Opinion Request. This limits the risk of the EIA Screening Report becoming invalid should material changes to the Scheme Boundary or Proposed Scheme be made following the receipt of an EIA Screening Opinion by the LPA. Greater certainty on the nature of the works also reduces the risk that EIA will be required, as it can be expected that environmental impacts will have in many cases been avoided or mitigated through design. An EIA Screening Opinion request should, however, not be delayed too far, in order to mitigate the impact on programme should it be determined that EIA is required.
- 6.2.4. Given the nature and extent of the Proposed Scheme (i.e. works within the Bus Station landownership similar to the existing building and forecourt), no significant environmental impacts are considered likely at this stage. However, the EIA Screening should be informed by initial assessment to ensure any potential impacts as a result of the Proposed Scheme, and whether this could be significant or not, is understood.
- 6.2.5. outlines the typical steps and timeframe associated with the preparation of planning applications.

	The submission of a request for pre-application advice is an optional process that provides the opportunity for applicants to seek advice from the LPA on their proposals before committing to submitting a formal planning application. Although it adds time to the start of the determination process, pre-application advice can save time at later stages, particularly where statutory consultees are involved, by highlighting issues that need to be addressed before an application is submitted. Section 122 of the Localism Act 2011 introduced a requirement for applicants to undertake pre-application consultation on proposals. The legislation does not include a prescribed timeframe or method of consultation. The requirement for an EIA can be confirmed by requesting an EIA Screening Opinion from the LPA (see above). The 2017 EIA Regulations 2017 state that the LPA has three weeks to adopt a Screening Opinion. Were it to be determined that the proposed works are EIA development, the scope of the EIA is agreed in advance by requesting an EIA Scoping Opinion from the LPA. The LPA should adopt a Scoping Opinion in five weeks (unless longer periods are agreed).
	This step generally includes public consultation, further on-site survey work and scheme development. Ongoing engagement with consultees is also likely to be required for a scheme of the scale proposed. This stage does not have a set timescale. A valid application comprises: Information requested on a standard application form;

	■ Mandatory national information requirements; ■ Information specified on an LPA's validation checklist; and ■ Payment of the correct fee. Full details on all the documents, drawings and information required will be available from the LPA.
	On receipt of an application, the LPA will determine whether it is complete and valid. The validation process often takes up to 10 working days for larger scale, more complex applications. The LPA's statutory determination period does not commence until the application is validated.
	Once an application has been validated, a period of public consultation will take place, this normally lasts for 21 days. The process is managed by the LPA. Consultation is a statutory requirement and must accord with the requirements detailed in Section 15 of the Town and County Planning (Development Management Procedure) (England) Order 2015. The precise publicity / consultation requirements depend to an extent on the type and scale of an application but will generally include: ■ Displaying a site notice(s) on or near the land to which the application relates; ■ Publication of a notice in a local newspaper; ■ Written notification to neighbouring residents and landowners, and community groups; and ■ Written notification to Statutory Consultees (e.g. Historic England, Environment Agency). At the end of the consultation period the LPA can determine the application. If additional information is requested to be submitted during the consultation process which is deemed to be 'further information', it may require the consultation process to be repeated which can lead to delay.
	As per Section 70(2) of the Town and County Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications must be determined in accordance with the local Development Plan, unless material considerations indicate otherwise. Therefore, when considering an application, the decision-maker will assess the proposals against the requirements of local and national planning policy and guidance, the comments of consultees and any other relevant matters (e.g. economic impact, pollution, visual impact etc). Promotion of the Proposed Scheme through the Local Plan Review, in advance of the planning application, will be vital to ensuring a successful outcome. Statutory timeframes for the determination of applications are set out in Section 34 of the Town and County Planning (Development Management Procedure) (England) Order 2015. LPAs have 16 weeks to determine an application accompanied by an Environment Statement. Where it becomes clear that an application will not be determined within the statutory timeframe (e.g. due to issues raised by consultees requiring

	resolution) the applicant and LPA can agree an extension of time. The applicant may also appeal against non-determination of the application.
	A planning decision for the proposed works would be expected to be made by KC planners. Planning permission would either be granted or refused. Where a proposal is granted, planning permission conditions will normally be attached to the decisions. Should it be called to a planning committee, members of the Planning Committee could decide to defer making a decision to a later date and request the applicant provide more information or make amendments to the proposed development.
	If the LPA refuses planning permission, the applicant has the right to appeal the decision to the Secretary of State (via PINS). An appeal must be made within six months of the decision date on the decision notice. Applicants can also appeal to the Secretary of State if they consider the conditions attached to a permission are unacceptable or if the LPA fails to deal with an application within the statutory time limit. Appealing a decision would considerably increase the decision-making timeframe. The likelihood of success would need to be carefully considered, particularly where refusal is based on a significant conflict with the development plan or substantial objections from statutory consultees. Appeals take on average between six and eight months to determine from the date a submission has been confirmed as valid. The time taken is dependent on the determination procedure (Written Representation, Informal Hearing, Public Inquiry) followed.

6.3

- 6.3.1. The Town and Country Planning (Tree Preservation) (England) Regulations 2012, Part 3, Regulation 14 sets out the exemptions to TPOs. Regulation 14 (1) (a) (iii) (cc) states that, '*Nothing in regulation 13 shall prevent [...] the cutting down, topping, lopping or uprooting of a tree [...] by or at the request of a statutory undertaker, where the land on which the tree is situated is operational land*

of the statutory undertaker and the work is necessary- (aa) in the interests of the safe operation of the undertaking; [...] (cc) to enable the statutory undertaker to carry out development permitted by or under the Town and Country Planning (General Permitted Development) Order 1995.'

- 6.3.2. The Town and Country Planning (Tree Preservation) (England) Regulations 2012, Part 3, Regulation 15 sets out the exemptions to TPOs for trees in a Conservation Area. Regulation 15 (1) (a) (iii) states that, '*Section 211(13) (preservation of trees in conservation areas) shall not apply to [...] the cutting down, topping, lopping or uprooting of a tree [...] by, or on behalf of, a local planning authority*'.
- 6.3.3. This enables the statutory undertaker to carry out the cutting down, topping, lopping or uprooting of trees within the Proposed Scheme area. It is expected that WYCA would confirm this with KC.
- 6.3.4. If any of the works affect a Listed Building or structure within its curtilage in a way that will change its character, then Listed Building Consent would be required.
- 6.3.5. The requirement applies to all types of works and to all parts of those buildings covered by the listing protection (possibly including attached and curtilage buildings or other structures), provided the works affect the character of the building as a building of special interest.
- 6.3.6. It is understood that Listed Building Consent would not be required for the Proposed Scheme; however, this will be confirmed with the LPA.

7.1

- 7.1.1. It is recommended that the Proposed Scheme design is developed to avoid or mitigate environmental impacts and provide enhancements wherever practicable to:
- Increase the likelihood of planning and other consents being granted;
 - Reduce the likelihood of an EIA being required (i.e. Permitted Development rights not applying on the grounds of the Proposed Scheme having significant effects);
 - Improve the performance of the Proposed Scheme within the assurance process in regard to quality design and environmental improvements;
 - Ensure the Proposed Scheme contributes to addressing the climate emergency;
 - Gain public and stakeholder buy-in and reduce the risk of opposition;
 - Use the opportunity of the TCF to deliver wider improvements beyond transport that benefit residents and visitors of Dewsbury;
 - Embed benefits early in the design when the opportunity to influence design is greatest and secure an evidence base for the inclusion of these benefits.
- 7.1.2. The recommendations provided in this report are based upon the Proposed Scheme design as of September 2021. Environmental opportunities should be reviewed throughout the ongoing development and delivery process.
- 7.1.3. A design decision log or schedule of environmental mitigation should be used throughout the development of the Proposed Scheme to track and secure mitigation and enhancement measures. This should clearly outline the responsibility and timing of how committed measures will be delivered, and will later be used as the basis of an Environmental Management Plan (EMP).

7.2

WYCA has set out a new Green and Blue Infrastructure Strategy with the aim of incorporating natural capital as a means of protecting the environment. It aims to:

- Reduce the frequency and severity of flooding where natural environment forms part of an integrated and catchment wide approach to water management and flood prevention.
- Improve physical and mental health where close proximity to the natural environment raises levels of physical activity and support good mental health.
- Connect and active managed habitats which support people, wildlife and biodiversity to flourish.
- Provide a high-quality natural environment which is actively contributing to the reduction of emissions and providing resilience to the effects of climate change.

- 7.2.1. To achieve these aims they will encourage the creation of places for the local community where the natural environment is incorporated into the urban environment and the design of new development.²³

7.3

The design of the Proposed Scheme and its implications on traffic flows should be carefully considered with regard to local air quality concentrations, particularly as NO₂ emissions within the Site Boundary exceed the UK annual mean objectives, as highlighted in Section 3.2. The design of the Proposed Scheme should aim to comply with the priorities of the 2019 Air Quality Action Plan²⁴ for Kirklees Council, referred to in Section 3.2.

7.4

- 7.4.1. The design should consider the key characteristics of Dewsbury Town Centre CA and valued townscape of the town. Where possible, stone features, boundary walls and paving should be retained and the design / materials that make up the Proposed Scheme should be sympathetic to the existing character particularly regarding the design elements of the Church of All Saints (Dewsbury Minister).
- 7.4.2. A Heritage Appraisal is recommended to better understand the heritage constraints within the Proposed Scheme. The appraisal will inform the early design of the Proposed Scheme by providing the opportunity to reduce the impact on the heritage assets and limit the need for mitigation measures to secure planning consent.

7.5

- 7.5.1. In terms of protected species, there features with potential for roosting bats associated with the roof of a staff canteen in the south east corner of the site. As the Proposed Scheme is likely to directly impact the roosting features identified in the PBRA, a single dusk or pre-dawn re-entry survey at each building has been recommended to ensure that there are no bats roosting on Site. This will need to be conducted between May – August. The requirement of a European Protected Species (EPS) licence will be dependent on the outcome of the further survey recommended and detailed development plans.
- 7.5.2. It is also recommended that night work (between dusk and dawn) is avoided to reduce disturbance to bats leaving / returning to their roosts. It is also recommended that any artificial lighting used as part of the Proposed Scheme is designed and erected in accordance with guidelines from the Bat Conservation Trust and the Institute of Lighting Professionals.

²³ WYCA (2021) Green and Blue Infrastructure Strategy. Available at: <https://www.westyorks-ca.gov.uk/growing-the-economy/strategic-economic-framework/policies-and-strategies/green-and-blue-infrastructure/> [Accessed: 05/10/2021]

²⁴ Kirklees Council (2019) Air Quality Action Plan for Kirklees Council. Available at: <https://www.kirklees.gov.uk/beta/crime-and-safety/pdf/air-quality-action-plan.pdf> [Accessed: 05/10/2021]

- 7.5.3. Nesting birds were found to be present on trees within the Site Boundary. Should these habitats require removal as part of the Proposed Scheme, it is recommended that works avoid the nesting bird season (typically March – September, inclusive). Should the works be planned within this period, they should be preceded by an ecological inspection by a suitably experienced ecologist to confirm the absence of active bird nests. If an active nest is recorded, a buffer of 5 m minimum should be implemented and remain in place until the nest is confirmed inactive.
- 7.5.4. In addition, the following general environmental protection measures are recommended for implementation during the construction phase of the Proposed Scheme:
- Measures should be taken to prevent dust and other emissions from construction affecting land and watercourses beyond the Site.
 - Excavations should be covered or securely fenced (with no potential access points beneath fencing) when the Site is closed (e.g. overnight) to prevent entrapment of animals.
 - Retained trees should be protected in accordance with BS5837: Trees in relation to design, demolition, and construction (BSI, 2012).
 - Noise and vibration should be controlled and kept to the minimum necessary.
 - Lighting used for construction should be switched-off when not in use and positioned so as not to spill on to adjacent land or retained vegetation within the Site.
- 7.5.5.
- 7.5.6. It is also recommended that the landscaping provision to provide Biodiversity Net Gain (BNG) is maximised, with guidance from an ecologist. This would support Kirklees Council Local Plan Policy LP30.

7.6

- 7.6.1. Dewsbury Town Centre is a Conservation Area, and although the Site Boundary is fully located outside of this zone, key views in and out of Conservation Areas need to be considered. The design of the bus station should be carefully considered to minimise the impact upon any views from the Conservation Area.

7.7

- 7.7.1. To accommodate the Proposed Scheme, 5 trees are to be removed from the site. The remaining trees will be retained, however the Root Protection Areas of these trees may be affected during construction works. The nature of the proposed works means with appropriate mitigation significant adverse impacts during demolition and construction on retained trees can be avoided, though these will need to be protected, as outlined in the Arboricultural Method Statement (Included in the Arboricultural Assessment Report, see Appendix C). Barriers will need to be erected prior to the commencement of any demolition and / or construction work, and monitoring of trees will need to take place. Oil, bitumen, cement or other material that is potentially injurious to trees should not be stacked or discharged within 10m of a tree.
- 7.7.2. The Proposed Scheme includes a landscaping design which will introduce native tree planting, improving the quality and diversity of trees on the site. There is the potential for net gain amenity value and tree canopy cover if supplementary tree planting is appropriately integrated with retained trees.

7.8

- 7.8.1. There are no historic landfill sites located within the Site Boundary, but four are located within 1 km. The Site Boundary lies within Secondary A aquifers meaning they support local water supplies.

7.9

The Proposed Scheme would need to be designed to avoid a detrimental outcome with respect to flood risk and drainage. Opportunities for enhancement should be pursued where possible particularly as the southern part of the Site Boundary lies within Flood Risk Zone 2.

- 7.9.1. Drainage should be designed to address any existing surface or fluvial flooding issues where practicable. The design should also be resilient to future changing climatic conditions such as rising river levels which will further exacerbate flooding and the likelihood of flooding events.

7.10

- 7.10.1. The location of the Police Station adjacent to the site boundary could mean that care should be taken during construction phases to not impede or restrict access to the site.
- 7.10.2. Care will also need to be taken to ensure that the bus station can remain operational throughout the project, providing key services to the local community.

7.11

- 7.11.1. The proposed works should encourage the maximum modal shift possible from private vehicles to public transport and active modes of transport.
- 7.11.2. Where possible, tree loss should be avoided to limit the reduction in carbon sequestration benefits within the Site Boundary. Where tree loss is necessary, this should be compensated within the Site Boundary through the landscape design. Kirklees Council will determine the need for compensatory planting, its type and extent and the most appropriate way of securing its delivery.
- 7.11.3. Sustainable construction practices will be explored prior to works commencing to limit the impact from material production, consumption and waste throughout construction.

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- 8.1.1. This section sets out the recommended tasks that should be undertaken to deliver the Planning and Environmental Consenting Strategy as set out above.
- 8.1.2. below presents the proposed scope of further works relevant to the elements of the Proposed Scheme in order to satisfy the requirements for the proposed consenting route (i.e. Permitted Development or Planning Permission).

Early Engagement with Kirklees Council Planning	Recommended that consultation with the Kirklees Council planners is undertaken early in the development of the Proposed Scheme.	To discuss the planning strategy for the Proposed Scheme.	Early engagement meeting with the Kirklees Council planners.
EIA Screening	Recommended that the EIA Screening Opinion Request and EIA Screening Report is prepared once the concept design is developed and the preferred option confirmed. This should be prepared as early as possible to minimise the risk to programme, should the Proposed Scheme be determined EIA development.	The Proposed Scheme currently exceeds the 1-hectare threshold for urban development as outlined within 10(b) of Schedule 2 of the EIA Regulations 2017. As such, the potential for significant impacts is required to be considered	Preparation and submission of EIA Screening Option Request and EIA Screening Report to Kirklees Council.
Heritage Appraisal	Recommended that a baseline study is undertaken to establish a full understanding of heritage assets and the implications for design, consent and further work. A Heritage Statement and/or Historic Environment Desk-based Assessment should then be prepared in support of the planning application.	■ To establish any key designated and non-designated heritage constraints; ■ Inform design, given the historical sensitivities (e.g. immediately north-west of the Grade II* listed Church of All Saints) preserving the character of cultural heritage should be a priority in design;	■ Review baseline data, including Historic Environmental Record (HER) data; ■ Preparation of historic environment features map; ■ Engagement with project team and local conservation officers; ■ Preparation of note / report setting out key constraints and recommended further work.

		- Inform the scope of further assessment (i.e. Heritage Statement and Historic Environment Desk-based Assessment); - To determine needs for further archaeological investigations, where applicable these should be undertaken early to minimise risk to programme.	
Noise Baseline Review and Engagement	Recommended that this study is undertaken to establish noise related risks and design considerations and engage with Kirklees Council officers on the scope of further baseline data collection or assessment required.	- To inform impact on local residents and other sensitive receptors, including local NIA areas. Ensure this is taken into consideration in design, and any requirements for surveys are identified and programmed. - To support a noise assessment that may be required for the planning application; and - To support an application for 'prior consent' for noise generating activities during construction, under Section 61 of the Control of Pollution Act 1974.	- Establish any existing noise data available; - Monitoring to establish baseline levels of ambient noise and vibration on the Site Boundary. The measured data should cover periods during which the works will be carried out; - Engagement with Kirklees Council noise/environmental health officers on scope of further assessment required; and - Liaison with design team.
Biodiversity Net Gain (BNG) Report	Kirklees Council will be consulted regarding the requirement of a BNG Report.	To meet Kirklees Council and national requirements that	- Engagement with Kirklees Council planning and conservation officers. - Completion of the Defra biodiversity metric 3.0.

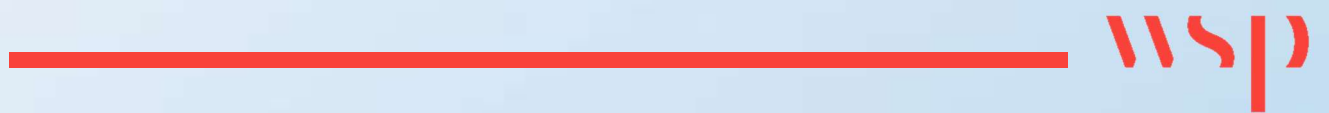
	If required, the BNG should be undertaken based on sufficient certainty of the Proposed Scheme design (i.e. once the concept design is developed and the preferred option confirmed).	developments should demonstrate BNG.	■ Consultation on the requirements and advice on any compensation requirements. ■ Preparation of a BNG Report
Further Bat Survey	A single dusk emergence or dawn re-entry survey for each building to determine presence/likely absence of roosting bats on site that may be impacted directly or indirectly by the Proposed Scheme. Dusk/dawn survey visits should be spaced apart (ideally by at least two weeks) and be carried out between This aligns with good practice guidelines ²⁵	■ This would likely identify the requirement for further surveys to determine the presence / likely absence of roosting bats.	
Visual Impact Assessment	Subject to discussion with Kirklees Council, a Visual Impact Assessment may be required to determine risks and inform the design prior to the planning application.	■ To establish the visual impacts as a result of the Proposed Scheme design.	■ Visual Impact Assessment.

■ ²⁵ Collins J. (ed.) (2016). *Bat Surveys for Professional Ecologists, Good Practice Guidelines (3rd Edition)*. The Bat Conservation Trust, London.

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- 9.1.1. This report provides an evidence base and recommendations to inform the discussion and agreement of a planning and environmental consenting strategy that maximises the likelihood of the Proposed Scheme's successful consent within the availability of the TCF.
- 9.1.2. A summary of the key recommendations is listed below:
- The design should seek to
where practicable. This will reduce the likelihood of the Proposed Scheme being considered EIA development, improve the likelihood of consent and reduce public opposition. More detailed recommendations are presented in
of this report;
 - In particular, the design should seek to
This will help reduce the requirement for additional consents;
 - The following works could potentially be carried out under Permitted Development Rights, as highlighted in Section 6:
 - Strengthening signage and wayfinding to improve integration and accessibility
 - Reconfiguration of the bus apron area to improve safety and efficiency
 - Possible green route through the site to improve pedestrian linkages
 - Integration with Kirklees Aldams Road and South Street proposals
 - However, the works associated with the building's entrance improvement, sustainability improvements, vehicle parking provision, and the landscaping and boundary improvements
as set out in
 - An EIA Screening Opinion Request and EIA Screening Report should be undertaken once the concept design is developed and the preferred option confirmed to demonstrate how potential impacts are unlikely to be significant and thereby improve the likelihood that the Proposed Scheme does not constitute EIA development. A non-EIA development outcome will allow the application of Permitted Development rights, where applicable. The EIA Screening Opinion Request should be prepared as early as possible to allow sufficient time to undertake the EIA process should it be required;
 - Further information on consents required is presented in , and
of this report;
 - Further bat surveys are recommended to be carried out before works commence, to determine the presence of roosting bats.
 -

Appendix A

FIGURES





Appendix B

ECOLOGICAL CONSTRAINTS REPORT AND PRELIMINARY BAT ROOST ASSESSMENT



Appendix C

ARBORICULTURAL ASSESSMENT REPORT





Three White Rose Office Park
Millshaw Park Lane
Leeds
LS11 0DL

CONFIDENTIAL

Appendix D. Climate Change Statement

Climate Change Statement

Part 1: Applicant details

Name of applicant/agent	West Yorkshire Combined Authority
Site Address	Dewsbury Bus Station Aldams Road Dewsbury WF12 8AR
Description of Development	Proposed transformation of Dewsbury Bus Station, located on Aldams Road, Dewsbury, Kirklees (the Scheme)

Part 2: Climate Change Mitigation measures

Please respond to the following questions considering the measures set out in the Climate Change Guidance note:
Q1: What measures have been/will be taken to reduce the energy demand associated with your proposed development beyond the minimum required in Building Regulations? (See section 2)
Please refer to the response to Q4. Introduction of an efficient Air Source Heat Pump (ASHP) to replace an aging gas boiler system in combination with photovoltaic (VP) panels has made the bus station building greener. Instantaneous hot water electric heaters have also been introduced, which are only operational when taps are open. Within the ASHP system, adequate controls have also been included to further improve the efficiency and operation of the system. New LED lighting and a DALI control system has been provided. DALI lighting control system is used in conjunction with PIR presence / absence detection and photocell control for daylight linking. New metering has been provided to the switchboard to allow for better monitoring and control of electrical systems. Proposed metering is split between lighting and power to allow for separate monitoring of systems.
Q2: What measures have been/will be taken to limit the carbon consumed through the implementation and construction processes, e.g. by reusing existing on-site materials or sourcing materials locally? (See section 3)
The development of a new bus station building was rejected in favour of refurbishment of the existing structure. The retention and reuse of the majority of the existing foundations, ground slabs, structural steelwork and some existing external walls and internal accommodation minimises waste, and minimises the requirement for procurement of new materials. New parapets to the concourse area have been designed as louvred to minimise structural loads on the existing steelwork from wind pressure. This permits the existing

structure to be retained with only limited strengthening required, minimising the need for new steelwork.

The proposals involve reusing existing incoming water supply and domestic sanitaryware items. Also, the existing extract ventilation system within the toilet area will be reused and refurbished by servicing the fan and cleaning the ductwork.

The boundary public realm/landscaping for the Scheme, uses reclaimed stone from site to construct a stone wall with piers and railings. The landscape design process has sought to maximise opportunities for removing existing hard standing and replacing with topsoil and ornamental shrub and tree planting. This is apparent to the southern and northwest boundary of the site.

A section of Sedum Green Roof has been specified on a section of the roof of the bus station building. This will provide a carbon sink and will help offset loss of existing trees in this location. Low maintenance planting, with seasonal succession has been specified to minimise frequency of maintenance.

The use of cold in-situ recycling or the incorporation of asphalt reinforcement have been included for consideration as potential options for the rehabilitation of the bus circulation route and bus stand pavement. These alternatives maximise the retention of existing pavement materials and reduce the volume of material that needs to be removed from site and replaced.

Minimising the use of Portland cement in concrete will be promoted where possible for pavement works, and the specification of warm mix asphalt (rather than hot mix) is to be implemented.

Q3: What measures have been/will be taken to utilise renewable or low carbon energy sources? (See section 4)

Introduction of an efficient ASHP, which uses a portion of energy from passing external air to replace an aging gas boiler system using fossil fuels, in combination with PV panels has made the bus station building more environmentally friendly. Instantaneous hot water electric heaters, which only are operational when taps are open to prevent wasting energy on excess hot water that may not be required, have also been introduced.

PV panels will be provided on all of the available space on south facing roof. The PV system will link with the existing LV panel board to supplement incoming supply.

Q4: What measures have been/will be taken to ensure the building design and layout has been optimised to energy efficiency beyond the minimum requirements in Part L of the Building Regulations ? (See section 5)

Where possible the existing heated accommodation has been designed to be upgraded to meet the u-value requirements for new build construction, bettering the minimum standards defined by building regulations for retained elements.

Thermal modelling has been undertaken and a natural ventilation strategy has been developed to help avoid overheating and the need for mechanical ventilation or cooling to the main concourse and mall spaces. New automatically opening windows in the concourse along with insulated glazing and cladding units, and automatic louvres have been specified to assist achieving a natural temperature and ventilation strategy, linked to the BMS.

New areas of ETFE roofing have been provided over the mall and concourse to increase natural light levels and minimise the required usage of artificial lighting. Photocells will be provided with the lighting system to ensure luminaires do not activate when sufficient daylight is provided.
Q5: What measures have been/will be taken to reduce potential impacts of flooding associated with your proposed development? (See section 6) No significant flood risk is identified to the building. Increased areas of soft landscaping will minimise discharge into the surface water drainage system and help limit potential for overflow. The existing sub-base below new planting areas are to be de-compacted to allow free drainage which will assist in any extended periods of high rainfall/surface run off. A 300mm layer of granular stone is to be incorporated into some planting areas which will also assist with drainage. Planting density/canopy heights will also assist in slowing rainfall inundation into these areas.
Q6: What measures have been/will be taken to reduce water stress associated with your proposed development? (e.g. Water retention and minimisation measures) (See sections 7 and 8) Increased areas of soft landscaping will be provided for natural soakaway of water reducing pressure on the capacity of the existing below ground drainage systems. Drought tolerant planting has been used in certain identified locations. Further, a mulch layer is to be provided to all planting to assist with water retention. No upstand kerbs have been detailed to planting. This will allow passive rainwater harvesting from adjacent walkways.
Q7: What measures have been/will be taken to provide biodiversity net gains? (See section 8) Provision of increased areas of soft landscaping and the provision of a new area of Sedum Green Roof on the building will provide opportunities for wildlife. The Sedum Green Roof will incorporate 8-12 species, together with species rich grassland with wildflowers will assist in biodiversity net gain. Ornamental planting is also proposed to the boundary of the Scheme and will incorporate a range of grasses, perennials, shrubs and bulbs. Together this will also assist in biodiversity net gain as it provides a range of canopy, leaf cover and flowers.
Q8: What measures have been/will be taken to reduce air pollution associated with your proposed development? (See section 9) The Scheme includes the provision of infrastructure to accommodate future electric vehicles and buses to help encourage the transition to the use of an electric bus fleet at the bus station, which will help remove pollutants from diesel / petrol vehicles. By utilising an ASHP instead of a gas boiler, pollution associated with building services on site will drastically reduce. The new system does not generate harmful gases such as nitrogen dioxide.

The Scheme includes the provision of increased areas of soft landscaping and the provision of a new area of a Sedum Green Roof on the building will assist in reducing air pollution, as the plants will capture particulate matter and absorb CO₂ to create oxygen.