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Your ref: 2023/62/92966/E  
Our ref: J0061352

24 May 2024

Dear Nick

## **LAND TO THE REAR OF 271, CLIFFE LANE, GOMERSAL**

### **APPLICATION REF: 2023/62/92966/E**

Further to our meeting on 29 February 2024 we write to submit revised information in relation to the proposed development at land to the rear of 271, Cliffe Lane, Gomersal, Application Ref: 2023/62/92966/E to address concerns raised by Richard Gilbert, yourself and consultees.

The following revised information is submitted in support of the application:

- Design Response Document, prepared by Loroc, updated May 2024
- Location Plan, Dwg. No. 1694-100
- Site Plan Layout, Dwg. No. 1694-101, Rev K
- Sections A – K, Dwg. No. 1694-101, Rev C
- Streetscapes A – K, Dwg. No. 1694-102, Rev D
- House Types AA, AB and BA, Dwg. No. 1694-103, Rev A
- House Types AC, BC and D3, Dwg. No. 1694-104, Rev A
- House Types D4, F and G, Dwg. No. 1694-105, Rev B
- House Types F, G and H and Garages, Dwg. No. 1694-106, Rev A
- House Types H, I and M, Dwg. No. 1694-107, Rev B
- House Types BBA, I and N, Dwg. No. 1694-108, Rev A
- House Types EA, EE, N, Dwg. No. 1694-109, Rev B
- House Types BA split, F and Garages, Dwg. No. 1694-110, Rev B
- Opportunities and Constraints Plan, Dwg. No. 1694-114
- Focused Sections, Dwg. No. 1694-115, Rev B
- Additional Land Layout Indicative Only, Dwg. No. 1694-116
- Block Plan, Dwg. No. 1694-1176
- Boundary Plan, Dwg. No. 1694-120, Rev D
- External Materials Plan, Dwg. No. 1694-121, Rev D
- Refuse Management, Dwg. No. 1694-122, Rev D
- EV Charging Plan, Dwg. No. 1694-123, Rev D

- Drainage Strategy – On Site, Dwg. No. 0100, Rev P4
- Impermeable Area, Dwg. No. 0102, Rev P2
- Offsite Ditch, Dwg. No. 0103, Rev P1
- Proposed Levels – P2 Option 2, Dwg. No. 0603-1, Rev P2
- Proposed Levels – P2 Option 2, Dwg. No. 0603-2, Rev P2
- Proposed Levels – P2 Option 2, Dwg. No. 0603-3, Rev P2
- Proposed Levels – P2 Option 2 Dwg. No. 0603-4, Rev P2
- Proposed Levels – P2 Option 2, Dwg. No. 0603-5, Rev P2
- Option 2 – Long Section Drawings Road 1, Dwg. No. 00800-1, Rev P1
- Option 2 – Long Section Drawings Road 2 to 4, Dwg. No. 00800-2, Rev P1
- Gomersal Offsite Flow Calcs, dated 28/03/2024
- Outline Landscape Masterplan and Specification, Dwg. No. PWP 752 002, Rev 2
- Soft Landscape Area Calculations Rev 01
- Stage 1 Road Safety Audit, dated 24 April 2019
- Extract from Appendix C of GG119 – Road Safety Audit (RSA) Brief Template dated 1 May 2024
- Access Arrangement Approved (Planning Ref: 2019/90902), Dwg, No. 152130-001, Rev A
- Highways Response Report, prepared by Sanderson, Dated March 2024
- Swept Path Analysis, Dwg. No. 152130-002, Rev A
- Visibility Plan, Dwg. No. 152130-003, Rev A
- Carriageway Dimensions, No. 152130-004
- Swept Path Analysis Shared Surfaces, 152130-005
- Arboricultural Impact Assessment – May 2024
- Biodiversity Net Gain Assessment – August 2023, Revision A

## Design Response

### *Layout*

The Design Response Report submitted on 28 February and presented at the meeting on 29 February sets out a response to the queries raised by Richard Gilbert and yourself. Following the meeting on 29 February the site layout plan and house type plans have been revised to reflect the discussion and additional responses (titled conclusion) have been added to the document in relation to each of the points raised.

This revised document (Design Response Document, prepared by Loroc, updated May 2024) should therefore be read alongside the revised plan package.

### *Density*

Within the original Design and Access Statement submitted as part of this application an assessment of the site and the indicative layout which was included within the outline application (LPA ref: 2019/60/90902/E) has been analysed. This analysis demonstrates that the indicative site layout for 98 units considered as part of the outline application is undeliverable and unviable due to levels and the cost of the engineering solution that would be required to make this feasible. This option was therefore discounted.

A review of the site and the technical constraints are shown on the Opportunities and Constraints Plan, Dwg. No. 1694-114. It is clear from the review that the following impacts on the developable area:

- Site Levels – the site falls from South to North and East to West with the lowest point being the North-West corner of the site. This creates design issues and directs how the site can be developed by cut and fill, re-grading and the use of split-level houses in places. This has also influenced the proposed drainage solution and the proposed road layout

- TPO Trees – Existing trees can be found within and on the site boundary and have varying RPA's that. There is a TPO tree that is located in the centre of the site that dictates the site layout around the tree's RPA.
- Existing former Mine Workings - The extent of mine working and the location of two former mine heads on the site had been well-documented as part of the 2019 planning application.
- Requirement to access the site via Cliffe Lane
- Proximity to existing houses on the periphery of the site
- Requirement to retain access to the remaining land which forms part of the allocation
- Existing public footpath
- On site BNG requirement
- On site POS requirement

The constraints and opportunities on the site have therefore led the design process and the development of the site layout. The Opportunities and Constraints Plan, Dwg. No. 1694-114 also identifies the developable areas and the density once these have been taken into consideration.

At the pre-application stage (LPA Ref: 2023/20293) a scheme for the demolition of the existing dwelling and erection of circa 18 apartments and 79 dwellings was proposed. Whilst the pre-application enquiry was being considered further work was being undertaken in relation to engineering and viability. It was determined that the proposed 18 apartments, which would have increased the density of the site scheme were unviable and were therefore removed from the proposal. This scheme was therefore discounted.

Following feedback from technical consultees and the former Planning Officer, Richard Gilbert at pre-application stage, revisions were made to the proposal to address concerns that had been raised prior to the submission of the Planning Application.

Following receipt of consultation responses and the discussion at our meeting on 29 February the design team and our technical consultants have worked to satisfy concerns whilst ensuring the proposed development maximises density. The revised proposed layout therefore represents a viable and technically deliverable layout which is in accordance with local and national planning policy, whilst maximising density.

### *Housetypes*

The design of the house types and garages have been amended to incorporate the comments discussed during the meeting on 28 February 2024. The revised drawings are:

- House Types AA, AB and BA, Dwg. No. 1694-103, Rev A
- House Types AC, BC and D3, Dwg. No. 1694-104, Rev A
- House Types D4, F and G, Dwg. No. 1694-105, Rev B
- House Types F, G and H and Garages, Dwg. No. 1694-106, Rev A
- House Types H, I and M, Dwg. No. 1694-107, Rev B
- House Types BBA, I and N, Dwg. No. 1694-108, Rev A
- House Types EA, EE, N, Dwg. No. 1694-109, Rev B
- House Types BA split, F and Garages, Dwg. No. 1694-110, Rev B

Following a review of the proposed engineering works, the proposed retaining wall has been reduced in response to the comments raised during the February 2024 meeting. This has resulted in some of the semi-detached and terraced house types being split along the party wall to accommodate the levels across the site. All house type splits differ across the site. The house type drawings highlight the party wall split.

Three storey house types are proposed in response to the levels across the site and are considered to be in keeping with the surrounding area which is analysed on pages 22 and 23 of the Design Response document. There are three storey properties on Burnley's Mill Road.

## *Clarification in relation to the impact on the allocation and remaining land*

An indicative site layout plan (Dwg. No: 1694-116) in relation to the remaining parcel of the site allocation is submitted to demonstrate that this land can be accessed via the proposed scheme and can be developed. Due to the constraints of this land in relation to levels, the RPA's of existing trees and the required separation distances to dwellings on the proposed site the indicative capacity is identified as 5 units.

The updated Design Response document prepared by Loroc dated May 2024 provides a commentary in relation to the indicative layout with access via the site and an indicative layout with an alternative access from Ferrand Lane.

## **Technical Matters**

### **Highways**

The submission includes a Highways Response Report and accompanying appendices prepared by Sandersons dated March 2024 which provides comprehensive response to the Highways Development Management Comments dated 25 January 2024 and the Section 38 Team Comments.

Also included within the pack is a copy of the Audit Brief which we understand Mark Berry, Highways Development Officer has confirmed is acceptable. The Road Safety Audit is taking place this week and further information in relation to this will be submitted later this month.

Long sections of the Roads are included within the revised pack.

### **Drainage**

The following revised plans and additional plans are submitted in relation to on site drainage to reflect the revised site layout and site levels in response to the comments raised by the LLFA:

- Drainage Strategy – On Site, Dwg. No. 0100, Rev P4
- Impermeable Area, Dwg. No. 0102, Rev P2
- Offsite Ditch, Dwg. No. 0103, Rev P1
- Proposed Levels – P2 Option 2, Dwg. No. 0603-1, Rev P2
- Proposed Levels – P2 Option 2, Dwg. No. 0603-2, Rev P2
- Proposed Levels – P2 Option 2, Dwg. No. 0603-3, Rev P2
- Proposed Levels – P2 Option 2 Dwg. No. 0603-4, Rev P2
- Proposed Levels – P2 Option 2, Dwg. No. 0603-5, Rev P2
- Option 2 – Long Section Drawings Road 1, Dwg. No. 00800-1, Rev P1
- Option 2 – Long Section Drawings Road 2 to 4, Dwg. No. 00800-2, Rev P1
- Gomersal Offsite Flow Calcs, dated 28/03/2024

In relation to the query regarding the retaining walls and flood water, the end of the roads will be set at the same level as the verge. There will therefore be no retaining walls to the north east, the only other retaining wall is to plot 1. This part of the site is not located on a low point however drains to the wall will be installed and this will be picked up in the private drainage system. Detailed notes are contained on the drainage drawings.

### **Landscape**

The landscape masterplan has been revised (Outline Landscape Masterplan and Specification, Dwg. No. PWP 752 002, Rev 2) to reflect the revised site layout, levels and drainage and to also address the comments raised

In summary the Outline Landscape Masterplan and Specification, Dwg. No. PWP 752 002, Rev 2 includes:

- Existing enhanced and proposed soft landscaping along the northern boundary of the site
- Included references to the following:
  - Invasive and potentially invasive species
  - 5yr maintenance requirement added and highlighted that the 1 year reference is in relation to the defects period only
  - Root protection to be included where required
- Included more bins and benches in the POS areas as requested
- Redesigned the play provision address the complexities of incorporating accessibility into the northern POS area due to the topography. The following provision is included in the scheme:
  - POS to include an exercise trail/circuit that utilises the natural topography of the site – 5 items of equipment with instruction panels
  - Small POS to include a play trail/LAP/Doorstep play – 3 items of simple timber play equipment with mounding, and natural play elements, benches, signage & bins etc. A 5m offset to liveable dwelling has been observed in accordance with policy
- Trees included where feasible in the street scene in accordance with Green Streets principles. These have been positioned in consideration of drainage infrastructure, easements, and attenuation.
- Native plants utilised where appropriate
- Various surfaced footpaths are provided in the POS with the gradients detail provided.

### **Trees**

Revisions have been made to the proposed site layout to take into consideration the concerns raised by consultees as a whole, including the Tree Officer dated 22 November 2023. A revised Arboricultural Impact Assessment dated May 2024 is submitted to reflect revisions to the site layout and provides a detailed rationale in relation to the removal of trees to enable the proposed development.

### **BNG**

Due to revisions to the site layout and the landscaping proposals the BNG calculations and BNG Assessment have been updated to reflect these changes.

Units obtained for the site post-development, based on retained habitats and habitat creation included within the landscape proposals that a net gain in respect to habitat areas is likely to be achieved with the current scheme with a potential biodiversity net gain of 3.16 habitat units (+17.85% net change). Potential gains of 1.15 hedgerow units (+30.04% net change) are also considered likely.

### **Conclusion**

We trust that the revised pack of drawings, information and this letter assist you in your assessment of the proposals and that you are now able to support the application.

If you have any questions or queries in relation to the revised information, please do not hesitate to contact me.

We would be grateful if you could confirm receipt of this information, timescales for feedback in relation to the revisions and also the viability assessment.

We look forward to hearing from you.

Yours sincerely

**Emma Winter MRTPI**  
Partner