



Architecture
Masterplanning
Urban Design

Land at Main Avenue
Cowlersley
Huddersfield

N81:3084

Statement of Community Involvement

December 2024

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1. Introduction

1.1 Purpose of Statement

1.1.1 This Statement of Community Involvement (SCI) has been prepared on behalf of Thirteen Group to accompany the submission of a full planning application for the erection of 57no. dwellings and associated works on land at Main Avenue, Cowlersley, Huddersfield.

1.1.2 This Statement is the result of a Community Consultation undertaken on behalf of our client to gather the views of the local community in order to help shape the proposals, prior to formal submission of the application.

1.1.3 Kirklees Council have a Development Management Charter 'Kirklees – The Place to Grow' which provides advice and guidance on a plethora of planning matters for development within Kirklees. Within the document it sets out the Council expectation in regards to pre-application consultation and public engagement. The document states:

'Pre-application consultation will usually be appropriate for schemes where:

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

1.1.4 The Charter continues by expressing that the Council *'will always encourage seeking pre-application advice and undertaking pre-application consultation for major and potentially controversial proposals'*. As part of the process our client has sought to engage proactively with the Local Planning Authority (LPA), with a pre-application enquiry submitted as part of ref. 2021/21121. Following the response from the LPA and in accordance with the guidance set out within the Charter a public consultation was carried out as part of the pre-application process. This document seeks to explain and evidence the extent of the public consultation undertaken, something which is also set out in the Charter as being duly necessary to accompany any formal submission.

1.1.5 The Council's guidance within the Charter aligns with that set out in the National Planning Policy Framework (NPPF) which further emphasises the importance of early engagement, with paragraph 40 stating:

'Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality preapplication discussion enables better coordination between public and private resources and improved outcomes for the community'.

1.1.6 In terms of the weight that can be afforded to proposals that have evolved following community consultation, the NPPF states:

'Applicants should, where applicable, provide sufficient information to demonstrate how their proposals will meet the design expectations set out in local and national policy, and should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot'. (Paragraph 137).

1.1.7 The Localism Act 2011, Part 6 Chapter 4 Clause 122(61W) sets out a requirement to carry out pre-application consultation. The legislation advises that where a person proposes to make an application for planning permission for the development of any land in England the person must carry out consultation on the proposed application in accordance with the following;

'The person must publicise the proposed application in such manner as the person reasonably consider is likely to bring the proposed application to the majority of the persons who live at, or otherwise occupy, premises in the vicinity of the land'.

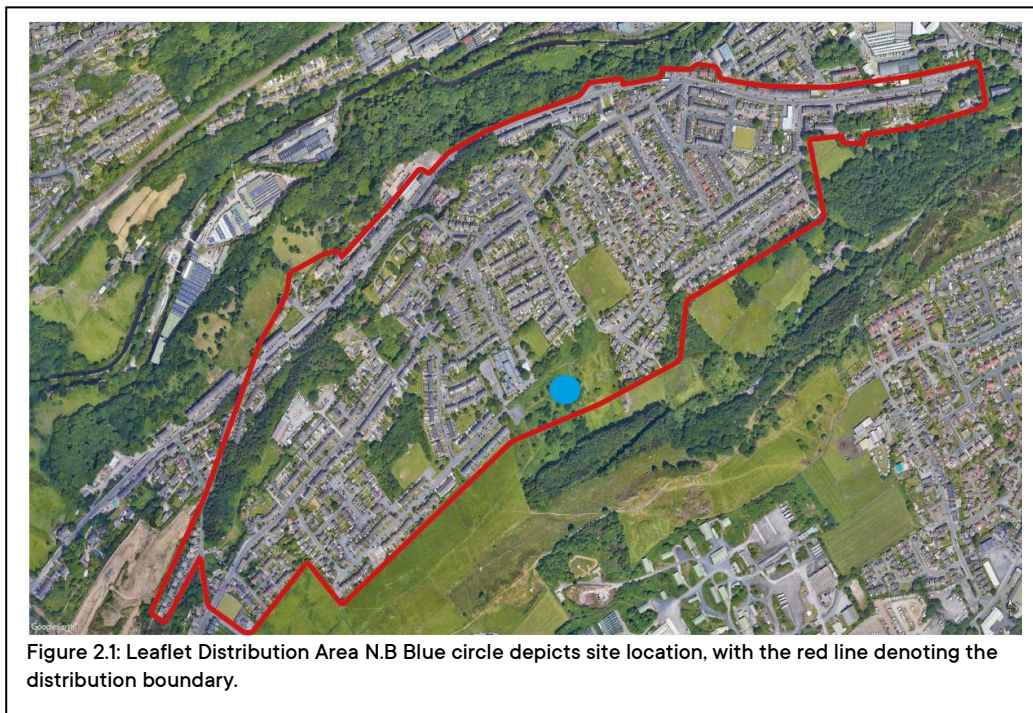
1.1.8 In accordance with local and national policy, along the requirements set out in The Localism Act (2011), this SCI sets out the work undertaken to ensure that the views of residents and stakeholders have been obtained, reviewed and duly considered as part of the pre-application process.

2. Public Consultation Exercise

2.1 Methods of Engagement

2.1.1 As aforementioned, during the pre-application enquiry (ref. 2021/21121) discussions with the LPA took place and it was acknowledged that public consultation should take place, given the guidance with the Charter, as well as within the NPPF and Localism Act. On this basis, a public consultation event was considered most appropriate, alongside other means of communication made available for local stakeholders to provide their views.

2.1.2 As such, a leaflet (shown in Appendix 1) was distributed on Friday 5 July 2024 to all houses within the red line boundary shown in Figure 2.1 – albeit as the leaflet distribution was done by postcodes, some houses outside the red line boundary may have also received a leaflet. This distribution area was considered to be the wider local area and those residents who would likely wish to have input about the development proposals. The leaflet provided information about the Public Consultation Event which was held at Milnesbridge Bowling Club on Tuesday 16 July from 2pm – 7pm.



2.1.3 In order to be as inclusive as possible a dedicated website was set up with relevant information about the scheme, including site layout plans, elevations and floor plans, inter alia. The leaflet also provided additional information about how the community and local stakeholders could provide their views should they be unable to attend the event, with people able to provide their views by email or post, as set out on the leaflet. Comments could be submitted until Tuesday 23 July 2024, to give local stakeholders plenty opportunity to provide their views.

2.14 In addition to the above, a virtual consultation was held by the project team with Local Councillors invited and members of the Council's Housing Growth team in attendance , so that they were aware of the current scheme and sufficiently informed should local stakeholders contact them about the consultation /proposals.

3. Public Consultation Responses

3.1 Engagement

3.1.1 As alluded to in the preceding section the Public Consultation Event was held on Tuesday 16th August 2024, with members of the project team in attendance to discuss the scheme with local stakeholders. A number of consultation boards were erected (shown in Appendix 3) which provided detailed of design development, the vision for the site, as well as the proposed site layout, along with proposed elevations and floor plans.

3.1.2 A response form (shown in Appendix 2) was provided to enable local stakeholders to provide their views on the current proposals and any points that wished to raise with the project team. As aforementioned, the consultation period remained live for another week after the event as some visitors wished to discuss with friends and family and wished to provide their views after the event. This was possible due to stakeholders being able to go away and view the dedicated website as they wished, and they could provide comments through the website (Appendix 6) as well as being able to provide their views via email or post.

3.1.3 The Public Consultation Event was well attended by members of the local community and stakeholders, with approximately 80 people visiting during the event to speak with the project team and discuss the scheme.

3.2 Public Comments

3.2.1 In total, 56no. of responses were received from local stakeholders. These comprised of the following:

- 22no. response forms from attendees of the Public Consultation Event;
- 3no. responses via email;
- 31no. responses through the dedicated website; and
- None by post.

3.2.2 Due to the type of engagement undertaken and the responses received, these are not necessarily easy to quantify what number or percentage of comments were either positive, neutral or negative, as many of the comments had varying views on different matters. Nonetheless, the below provides a summary of comments noted as positive aspects of the scheme, as well as neutral comments that were more general statements about the development or what they would like to see as part of the scheme, in addition to negative comments/concerns were raised by stakeholders.

Positive Comments

- New housing helps to meet the housing need;
- Provision of affordable housing helps local people to afford good quality homes;
- Good that part is for affordable purchase for young couples/first time buyers to get on to the housing ladder;
- The proposals fit in with the site and the surroundings;
- Good that there is consultation with local people;

Neutral Comments

- Already similar housing nearby;
- Vital that environmental standards are met including, solar panels, heat pumps, ecology, etc.;
- Be good to consider social aspects such as relationship with local community groups/sports clubs;
- If development proceeds then hope there is good building control and management of the site;
- Houses need to be constructed to very high insulation standards;
- Doubt that comments by local people make any difference but glad to see consultation happening;
- Further consultation should take place.

Negative Comments/Concerns

- Provision of all affordable housing are not wanted and local people do not want it as it will de-value property prices;
- Prefer private housing on the site;
- Concerns that the dwellings will be genuinely affordable;
- There appears to be a lot of houses on site as part of the current proposals;
- There appears to be a lot of 2no. bedroomed dwellings on site;
- The area does not need more housing;
- The site should not be developed;
- New builds are notoriously badly built;
- The development will add further vehicles to the area with existing streets roads being heavily congested and access to the site being a concern;
- Concerns about flooding in the area and further built development will only add to water run off;
- Loss of green space and impact upon existing wildlife and ecology;
- The development will get rid of leisure space where children play and people walk their dogs;
- Not enough infrastructure in the locality, with the scheme putting more pressure on doctors, dentists, schools, etc.;
- The proposals will block light into houses in the vicinity which impacts privacy;
- Development will overlook private amenity space of nearby dwellings;
- Concerns about anti-social behaviour as a result of future occupants;

3.3 Response to Public Comments

3.3.1 Many of the comments from local stakeholders concerned a number of different aspects, with people giving varying degrees of importance to different elements. All the comments received have been reviewed and discussed by the Project Team, and where possible changes to the scheme have been made (as discussed in the proceeding section). Nonetheless, it is worth responding to the neutral and negative comments/concerns received in order to address and alleviate the points raised. As such, the following commentary seeks to respond to the neutral and negative comments (as set out above) in chronological order (for ease of understanding).

Neutral Comments

3.3.2 Some commentary was provided from visitors about similar housing/affordable housing in the area. Thirteen Group are a well renowned registered provider who primarily operated in the North East but are working alongside Kirklees Council to bring forward affordable housing on a number of sites. Due to viability challenges, the site has not been developed by a standard housing developer, thus the reason as to why Thirteen Group, who are a non-profit organisation, have been brought forward to assist with the delivery of high quality dwellings that meet the housing needs within the area. Whilst there may be affordable/similar dwellings in the area, the provision of affordable dwellings is crucial to ensuring everyone has access to good quality homes that meets their needs and allows them to have a good quality of life.

3.3.3 In terms of environmental standards, all properties will benefit from photovoltaic panels and air source heats pumps to provide future proofed means of energy production and provide good standards of energy sustainability. All dwellings will encompass fabric first solutions, whereby careful consideration is afforded to insulation and use of energy efficient materials to assist with energy sustainability, but to also provide resilience against the challenges of climate change. Further green technology has been incorporated into the scheme with the inclusion of electric vehicle charging points, which futureproof dwellings as we transition to more sustainable means of transportation such as electric cars.

3.3.4 In terms of social aspects, building control and management, Thirteen provide all future residents with welcome packs which provide a plethora of information about travel, key destinations, social/communities activities in the area. As is the case with all Thirteen's developments they ensure all dwellings are built to a high standard, with continued management undertaken throughout the lifespan of the scheme to ensure it is used in an appropriate way and to encourage community cohesion.

3.3.5 In terms of concerns about the impact of public comments and the request of further consultation, as set out within this report, the comments that were received have indeed influenced the development which has enabled a better scheme to be proposed. Whilst no other public consultation is intended to be carried out prior to submission of the application, due to the extent of the consultation carried out to date, all

local stakeholders have the opportunity, as is a statutory requirement, to provide their views during the determination process when consultation occurs which will be undertaken by Kirklees Council.

Negative Comments/Concerns

- 3.3.6 Concerns were raised in respect of an entirely affordable development, the lack of private housing, and affordable homes not being wanted by local residents and the fact that such will de-value property prices. As alluded to above, the site has been allocated for some time and due to viability challenges a standard housing developer has not sought to develop the site. Thus, the reason Thirteen Group have come forward, due to affordable housing being less reliant on viability concerns due to them being a non-profit organisation. Therefore, justifying as to why an all affordable development has been endeavoured in this instance.
- 3.3.7 It is worth noting that the purpose of the planning system is to protect the public interest, not private matters. The value of properties is a private matter and the impact of a development on the value of private property is not a material consideration and thus cannot be afforded any wait during the planning process.
- 3.3.8 Concerns about the dwellings being genuinely affordable were raised. Thirteen group are a registered provider and are therefore bound by the rules and regulations of not only the planning system and the requirements set by Kirklees Council, but also by Homes England through funding regimes. As such, the pricing for all dwellings (whether that is for rent or shared ownership), will follow established principles which will reflect the economic factors within the locality to ensure the pricing is affordable for future occupiers.
- 3.3.9 Some stakeholders commented on the quantum of development and the mix shown in terms of the number of 2-bed dwellings. The proposed quantum of development is in fact less than the allocation for the site as set out in the Local Plan. This is largely due to the fact that due to onsite constraints, such as the topography, it is not possible to achieve the originally envisaged quantum. Nonetheless, the proposed quantum is considered to be acceptable with policy requirements and seeks to deliver a beneficial uplift in housing numbers in the area and is deemed to be an efficient use of the site/allocation. In terms of the housing mix, the mix has been dictated by housing need in the area as identified by Kirklees Council, along with Thirteen's research. Since the Public Consultation Event, following discussions with the Local Planning Authority, the percentage mix of 2 bed dwellings has marginally increased by 7% in terms of the overall mix. Pertinently, this accords with the housing need in the area and is considered to be entirely acceptable.
- 3.3.10 Some stakeholders comments on the area not needing more housing and suggest that the site should not be developed. The site is an allocated site for residential development, as is set out in the Local Plan. The proposals will deliver a high quality scheme that will provide affordable housing for which there is an identified need within the locality.

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- 3.3.11 Concerns about the build quality and that new builds are 'notoriously badly built'. This is something that we would have to vehemently disagree with and these comments are a generalisation. Thirteen are committed to the delivery of high quality housing, with Strata who are a well renowned developer in Yorkshire acting as contractor for the scheme, both of whom have a proven track record of successfully delivering good build quality. All new dwellings are required to have considerable environmental benefits compared to older housing and are held to strict requirements in terms of building regulations, something that will be no different on this scheme. Therefore, the proposals will not result in any issue of build quality and will in fact provide considerable benefits to the housing stock in the area.
- 3.3.12 A number of stakeholders commented about the additional uplift of vehicle trips/movements that would be established. As part of the proposals, technical transport reports will accompany the submission which will analyse technical highway considerations to demonstrate the acceptability of the scheme in terms of highway matters. The proposals will not give rise to any unacceptable impacts upon highway safety or result in cumulative impacts upon the capacity of the highway network, and is thus considered to be acceptable.
- 3.3.13 Matters pertaining to flooding were also raised by stakeholders. Similarly to highway considerations, a Flood Risk assessment and Drainage Strategy accompanies the application which demonstrates that the proposals will not give rise to flood risk increases as a result of the development. A logical and technically sound approach has been devised by engineers and the proposals in respect of flood risk is considered to be appropriate and accords with all relevant technical guidance.
- 3.3.14 Loss of green space/leisure space was another matter raised. Whilst indeed the site in its current form comprises of green space it is an allocated site for residential redevelopment, as aforementioned. Nonetheless, the proposals have been formulated with full consideration of open space provision and ecological considerations. The proposals include an area of dedicated open space that allows for play and recreations. In addition to this, part of the site (to the south, but outside the red line boundary) is to be retained with scope to improve habitats within that area and provide ecological enhancement. Furthermore, following a review by the project team further consideration has been afforded to connectivity to open space for health and wellbeing benefits.
- 3.3.15 A lack of infrastructure was another aspect that was raised. As discussed with stakeholders who raised such matters, it will be within the gift of the Local Planning Authority to request funds from the applicant should additional financial contributions be needed due to pressure on existing infrastructure that may be perpetuated by the proposals. Any associated financial contributions that may be required can be duly secured as part of a Section 106 legal agreement between the Council and the applicant (Thirteen).
- 3.3.16 Concerns about impact upon amenity such as the blocking of light of existing dwellings and overlooking of private amenity space were discussed by stakeholders. These aspects were reviewed by the wider project team and amendments have been made to alleviate some of the concerns raised (as will be discussed in the following section). Nonetheless, as mentioned with those who raised such issue, the
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proposals have been devised to accord with planning policy requirements. Whilst some aspects on amenity can be subjective, it is considered that compliance with policy requirements indicate the proposals are in fact wholly acceptable and would not give rise to any amenity issues in relation to existing dwellings adjacent to the site.

- 3.3.17 Some stakeholders were worried about anti-social behaviour as a result of future occupants. These comments are not only derogatory but unacceptable, however, such matters are non-material considerations. Notwithstanding, the proposals will deliver affordable housing to meet an identified need with Thirteen retaining management of the site in perpetuity. The scheme has been designed to accord with the principles of secure by design to ensure the proposals are designed in such a way that deters unwanted behaviour and will provide a safe and secure environment for all.

4. Influence of Public Consultation

4.1 Development Changes

4.1.1 In light of the comments received, the project team reviewed all the stakeholder comments that were submitted. As a result, a number of aspects have been amended. Figure 4.1 below shows the development proposals at the time of the public consultation, whilst Figure 4.2 displays the current proposals.



4.1.2 As can be seen when comparing Figures 4.1 and 4.2, a number of changes have been made in light of the comments received. Firstly, the housing mix has changed to provide a better spread of tenure and typologies, to better align with the housing needs within the area, as set out by planning policy. This included the removal of 4 no. apartments and the addition of 3no. houses which was possible following a slight configuration change.

4.1.3 Furthermore, to provide better accessibility and permeability to areas of open space, the proposal now includes access on the south-eastern corner of the site to the green space to the south. The proposed stepped access has been incorporated due to the need to include retaining walls as a result of the topographical constraints of the site. Nevertheless, these features, enable future and existing residents' direct access to the green space to the south, which will be enhanced, where possible, for biodiversity.



Figure 4.2: Proposed Site Plan at present (Submission of Planning Application)

- 4.14 To alleviate some concerns regarding separation distances and overlooking, some typology and layout changes have been made. These concerns primarily arose from Plots 50 and 51 on the proposals shown at the Public Consultation and the relationship with the dwellings to the east. Upon review changes have been made including the alteration to a wide fronted property for Plot 52 (current proposals), to give a greater distance between the plot and the rear elevation of the existing properties to the east. These changes ensure the separation distances are suffice and accord with standards set out in current planning policy.
- 4.15 The abovementioned changes have resulted in a better quality of development which has sought to go some way to alleviate some of the concerns raised by stakeholders. Therefore, the early engagement that has been undertaken has been useful to positively shape the development.

5. Conclusion

5.1 Summary

- 5.1.1 As set out in this report, the applicant and project team undertook proactive early engagement with the local community and stakeholders during the pre-submission process in line with local and national planning policy guidance. The views of the community were obtained and taken on board by the project team. These comments proved useful and allowed the scheme to be altered in order to create a higher quality form of development. The public consultation that was undertaken positively influenced the development proposals.
- 5.1.2 During the consultation process, every effort was made to make stakeholders aware that this consultation exercise does not replace the one carried out by the Council upon the receipt of a formal, valid planning application.

6. Appendices

6.1 Appendix 1 – Public Consultation Leaflet



Managing and building homes



Public Consultation Event

We'd like to hear your views

Thirteen Group and Strata are bringing forward a high-quality residential development of 56 two, three and four bedroom homes on land at Main Avenue, Cowlersley, Huddersfield, HD4 5US.

Date: Tuesday 16 July, 2024
Location: Milnsbridge Bowling Club, Bowling Street, Cowlersley, Huddersfield, HD4 5TF
Time: Drop in from 2-7pm


We'd like to invite local residents and stakeholders to attend a public consultation event to hear your views in relation to the current proposals (see overleaf). Members of the project team will be in attendance.


The proposed site for the new homes is shown below:




The development proposals are available on our dedicated webpage:
www.thirteengroup.co.uk/kirklees

If you are unable to attend the event and would like to provide your views, please contact us via:

 **Email:** news@thirteengroup.co.uk




 **Post:** Development Team, Thirteen Group, Hudson Quay, Windward Way, Middlesbrough, TS2 1QG

 **Telephone:** 0300 111 1000


Closing date for feedback is Tuesday 23 July, 2024.

Housing Association




Housing Association: Thirteen Group
Developer: Strata
Consultant: IDPartnership Northern
Engineering Architect: Queensbury
Project Management: Identity Consult



You can also scan the QR code to submit your feedback:



6.2 Appendix 2 – Public Consultation Response Form

		
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Public Consultation Response Form

Development at Main Avenue, Cowlersley, Huddersfield, HD4 5US.

Please fill in the boxes below to provide us with your views of the current development proposals.

Are the proposals of an appropriate size for the site?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no, please tell us why?	

Do you think that the current scheme will deliver high quality housing?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no, please tell us why?	

Do you think that the current scheme responds positively to the local context?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no, please tell us why?	

Continued overleaf.


Do you think that the current scheme provides a good mix of dwelling types?	
Yes <input type="checkbox"/>	No <input type="checkbox"/>
If your answer is no, please tell us why?	

Do you agree that the development being entirely affordable housing is a good solution to providing much needed housing in the area?			
Strong Disagree <input type="checkbox"/>	Disagree <input type="checkbox"/>	Agree <input type="checkbox"/>	Strongly Agree <input type="checkbox"/>
If you disagree, please tell us why?			



If you have any other comments about the development proposals then please provide them in the box below.

Thank you for providing your comments, these will be reviewed by the Project Team and your input is very much appreciated. Should you have any further queries then please speak with one of the members of the team.

6.3 Appendix 3 – Public Consultation Boards



Managing and building homes





Welcome


Where do you live?

Thank you for your attendance today, we welcome you here to provide your much appreciated feedback on our development proposals at Main Avenue, Cowlersley. To help us understand the feedback you provide geographically, please mark on the map below where you live with the stickers provided.


The new development looks to create 56 dwellings on the site including apartments and two storey housing with areas of public open space. The size of the housing will be a range of 2 - 4 bedrooms.





Plan of the development site and surrounding area



Plan of the development site



Managing and building homes

Who are we?

thirteen


We are a housing association that provides more than 73,000 people in the North East, Yorkshire and Humber region with homes, support and opportunities to grow. Thirteen are the developer and end operator for the scheme.

We invest millions of pounds each year to keep our homes safe, secure and well maintained and we support those who need a little help. We have an excellent track record of building new homes for rent and build hundreds of high-quality and modern homes that meet the needs of local people every year.



strata Strata is a family owned, residential development company operating across Yorkshire, the Midlands and the North East. Founded in 1919, we have over 100 years' experience designing and building quality, contemporary new homes. Strata is acting as the main contractor for the development.

Producing quality homes that are beautifully presented, sustainable and affordable, is completely integral to our journey as a business. Through our Modern Methods of Construction (MMC), we have pledged to continue our mission to build high quality Low Carbon homes. Our Low Carbon homes are clever, not complicated, designed to enrich lives by making it easy to reduce environmental impact. Smart technology intuitively adapts to the unique needs of the occupier, learning over time about the way they live and adjusting accordingly to reduce energy costs and waste.

Strata is a partnership developer with strategic relationships with several Local Authorities, Homes England and a number of Registered Providers. Our long-standing commitment to quality and our wider social and economic investment to support local people remain at the core of what we do. For every project we're involved with, we can deliver bespoke employment, training and social inclusion programmes which are tailored to the local community and Local Authorities needs.



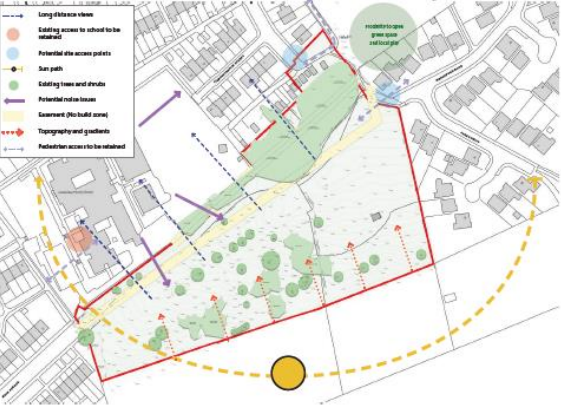
Managing and building homes


The Site

The site is 2.14 Ha of grassland with a mixture of small trees and shrubs. There are a number of garages to the northern end of the site which have been demolished and relocated as part of the development proposals.

The topography of the development area rises steeply to the south which will be a constraint as well as an opportunity for the proposed development. Any land which can't be developed will be used to provide bio-diversity net gain and informal landscaping amenity space for the residents.



Constraints and Opportunities Plan



Site as Existing



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The Vision

Key Masterplanning Principles

Landscape led development

Sequence of key spaces

Community for all

Characterful Development



Illustrative Landscaping Imagery

In terms of landscaping, well located and appropriate street tree planting helps with biodiversity gains, as well as health and well-being.



Landscape is used to break up parking courts and large areas of hard standing.



Informal paths and routeways are located in the open area to the south of the site.



Formal greenspace is located to the east of the site which may include designated childrens play.

Proposed Site Layout



Proposed Streetscene

The proposed streetscene looks to draw on the vernacular of the surrounding area to create a development that is of a contemporary feel but strongly integrated.



Location of Proposed Streetscene



Proposed Streetscene AA

thirteen
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idp **strata**

Welcome


Where do you live?

Thank you for your attendance today, we welcome you here to provide your much appreciated feedback on our development proposals at Main Avenue, Cowlesley. To help us understand the feedback you provide geographically, please mark on the map below where you live with the stickers provided.

The new development looks to create 56 dwellings on the site including apartments and two storey housing with areas of public open space. The size of the housing will be a range of 2 - 4 bedrooms.



Plan of the development site



Plan of the development site and surrounding area

6.5 Appendix 5 – Photographs from Public Consultation




6.6

6.7 Appendix 6 – Website Extract

Questions Responses 31

Preview Style Collect responses Present



Kirklees: Public Consultation Event


Thirteen Group and Strata are bringing forward a high-quality residential development of 56 two, three and four bedroom homes on land at Main Avenue, Cowlesley, Huddersfield, HD4 5US.

The development proposals are available on our dedicated webpage: www.thirteengroup.co.uk/kirklees

The closing date for responses is Tuesday 23rd July 2024.

Section 1

1. First Name
2. Last Name
3. Postcode *



Revision	Date	Notes	Prepared By	Authorised By
P1	17/12/2024		TG	GP



Architecture
Masterplanning
Urban Design

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