

Consultation Response from KC, Landscape - Emma Mills

2025/90889 Former Combs Hostel, Hall Lane, Thornhill, Dewsbury, WF12 0PL

Demolition of existing hostel and erection of residential development comprising 34 dwellings

Date Responded: 14.04.2026

Responding Officer: Landscape

Responding Ref: QQxx 14.04.2026

Market Housing
Please specify each type of housing and number of units proposed

Housing Type:	
Flats:	
1 Bedroom:	0
2 Bedroom:	0
3 Bedroom:	0
4+ Bedroom:	0
Unknown Bedroom:	0
Total:	0

Proposed Market Housing Category Totals

1 Bedroom Total	2 Bedroom Total	3 Bedroom Total	4+ Bedroom Total	Unknown Bedroom Total	Total
0	0	0	0	0	0

Planning Portal Reference: PP-13898774

Social, Affordable or Intermediate Rent
Please specify each type of housing and number of units proposed

Housing Type:	
Flats:	
1 Bedroom:	0
2 Bedroom:	0
3 Bedroom:	0
4+ Bedroom:	0
Unknown Bedroom:	0
Total:	0

Proposed Social, Affordable or Intermediate Rent Category Totals

1 Bedroom Total	2 Bedroom Total	3 Bedroom Total	4+ Bedroom Total	Unknown Bedroom Total	Total
0	0	0	0	0	0

34 dwellings: triggers all typologies except allotments. There doesn't appear to be on site POS therefore it will be an off site lump sum. These calculations are current, April 2026 figures.

Open Space Provision Compared to Quantity Standards (RED = CURRENTLY DEFICIENT)**

Select Ward	Amenity Greenspace (ha per 1000 pop)	Parks & Recreation Grounds (ha per 1000 pop)	Natural & Semi-Natural Greenspace (ha per 1000 pop)	Allotments (ha/p 1000 households)
Dewsbury South	0.23	0.9	0.58	0.67

Dwelling Type	Number of proposed dwellings
Market/Affordable Housing (100%)	34
Market/Affordable Housing 2-bed Flats (75%)	
Market/Affordable Housing 1-bed Flats (50%)	
Housing for Older People	
Student Housing	
TOTAL	34

LP63 Open Space Typology	Sq m of space required on site	OR	Payment towards off-site provision
Amenity Green Space	495.72		£17,143.75
Children & Young People	455.60		£19,493.85
Parks & Recreation	660.96		£23,819.24
Natural & Semi-Natural Green Space	1652.40		£20,374.98
Allotments/Community Growing	0.00		£0.00
Outdoor Sports	714.00		£15,248.65
TOTAL	3978.68	(inspection fees will apply)	£96,080.46

Off Site Open Space & Location of site/s to receive POS contribution : An offsite contribution would be considered advisable in lieu of a LAP and or POS on site due to the proximity of the existing facilities across from the site beyond Hall Lane at Thornhill Rectory Park.

£ 96,080 towards, but not limited to Thornhill Rectory Park and other existing facilities in the vicinity of the development.

By:.. Preferably prior to occupation of 25% of dwellings (N.B. we're likely to require the payment or any final instalment earlier than the final dwelling, to avoid disincentivising completion)

Trigger points if payments phased: Preferably prior to occupation of 25% and 50% occupation.

All S106 Agreements should have indexation added to financial payments requirements.

Planting proposals:



We welcome the retention of some of the existing trees on site. We have concerns thought, that some of the dwellings are too close to the existing trees to be retained and that there will potentially be ongoing pressure and requests for them to be cut down or cut back from the new residents. Adequate root barriers will be required.

There are minimal trees in the scheme - Please be reminded of the council's advice regarding Green Streets principles, as well as paragraph 131 of the NPPF, which requires new streets to be tree-lined.

*"Trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined**, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible. Applicants and local planning authorities should work with highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users."*

*** Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate*

All new tree planting within 5m of the adoptable highway to include adequate root barrier, clearly identified on the proposed landscape plans.

Please show drainage infrastructure on the landscaping plans, to demonstrate no conflict between trees and drainage.

Although space is limited, the proposed landscape scheme and layout should avoid dominance of hard surfaces/car parking to frontages.

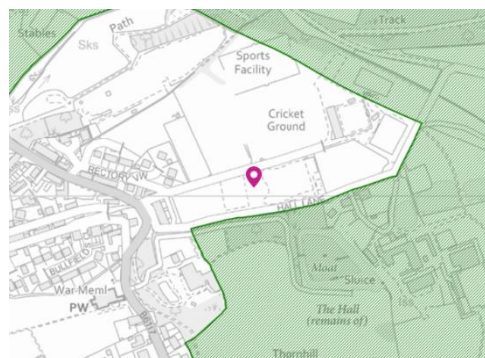
Invasive non-native species pose a significant threat to biodiversity in Britain. When submitting detailed landscape proposals, preference is for species which are native, fruit bearing species, where appropriate. Potentially invasive species are not favourable and details from the list published by Natural England [can be found here](#). [Horizon-scanning for invasive non-native plants in Great Britain - NECR053 \(naturalengland.org.uk\)](#)

There's some further guidance on [NNESS on alternative species to use for landscapers here](#). Species selection is important and those which are potentially more invasive should be substituted for less potentially invasive species. No plant species located on part 2 of schedule 9 of the [Wildlife and Countryside Act 1981 \(legislation.gov.uk\)](#) will be considered.

The submitted planting schedule includes several species identified within Natural England's horizon-scanning assessment of potentially invasive non-native plants (NECR053) including:

Lonicera nitida (Critical-ranked terrestrial taxon),
Pyracantha spp. (Critical-ranked),
Crocsmia hybrids (Critical-ranked),
Berberis thunbergii (Moderate Risk),
Spiraea (a genus with species assessed as having invasive potential).

These species are not subject to statutory control; however, the NECR053 report highlights them as having traits or behaviours associated with increased risk of spread into natural or semi-natural habitats and therefore recommends a precautionary approach to their use. In this context, the planting scheme may benefit from substitution with non-listed alternatives or the provision of management measures to ensure these taxa do not contribute to unintended colonisation of habitats in the vicinity, especially given the proximity of the current greenbelt.



We welcome that the planting proposals include replacement of failed plants for a period of 5 years – this will help ensure establishment of the landscape scheme and should be included in the condition.

- The approved landscaping scheme shall, from its completion, be maintained for a period of five years. If, within this 5 year period, any tree, shrub or hedge shall die, become diseased or be removed, it shall be replaced with others of similar size and species unless the Local Planning Authority gives written consent to any variation.