



**Canal &
River Trust**

Making life better by water

Kirklees Metropolitan Council
PO Box B93
Civic Centre 3
Huddersfield
HD1 2JR

Your Ref 2025/91184

Our Ref CRTR-PLAN-2026-46227

Friday 27 February 2026

Dear Jillian Rann,

Proposal: REVISED AND ADDITIONAL INFORMATION RECEIVED: Erection of two storey industrial unit (Use Class E(g)(iii)), with associated car park, service area and other associated works

Location: Land off Bretton Street, Savile Town, Dewsbury

Waterway: Dewsbury Arm (Calder & Hebble Nav)

Thank you for your consultation on the revised and additional details received in connection with the above planning application.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

As detailed in our previous response dated 25th August 2025, the main issues relevant to the Trust as statutory consultee on this application are:

- a. The impact on the character and appearance of the waterway corridor, including the impact on designated heritage assets;
- b. The impact of the proposed surface and foul water drainage to the canal;
- c. Measures to reduce the risk of pollution towards the canal during and post development; and
- d. The impact towards biodiversity associated with the waterway corridor.

Based on the information available, and taking account of the revised information, our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that suitably worded **conditions are necessary** to address some of these matters. Our advice and comments follow:

The impact on the character and appearance of the waterway corridor, including the impact on designated heritage assets

The site is located next to the existing canal. Our previous response highlighted concerns with the original proposals, which sought to remove existing vegetation between the new built development and the canal. The original proposals sought to replace the planting with low-growing planting, which would have been unlikely to be

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sufficient to screen the proposed new industrial building and associated compound from the canal, and therefore could have detracted from the appearance of the waterway and also the setting of nearby listed structures.

The revised proposals seek to retain a larger band of trees on site, which would help to mitigate the impact of the scheme as seen from the canal. We believe that this would help ensure compliance with the aims of Policy LP 32 'Landscape' from the adopted Local Plan Strategies and Policies document, which states that proposals should be designed to take into account and seek to enhance the landscape character of the area considering in particular the appearance of rivers, canals, reservoirs and other water features within the landscape.

We request that any consent for the scheme should seek to secure the proposed soft landscaping arrangements submitted with the revised details. **This could be secured through the use of appropriately worded condition(s).**

Surface and Foul Water Runoff to the Canal

As with the previously submitted details, the submitted drainage strategy shows a proposal to direct both surface and foul water (via package treatment plant) runoff to the canal.

In line with the aims of policy LP 34 'Conserving and enhancing the water environment' from the adopted Local Plan, development should ensure that there is no deterioration of water courses or water bodies.

We do request that full details of any Package Treatment Plant should be provided prior to its installation, so that the impact of the foul water connection shown on the canal can be fully assessed. **Details could be reserved through the use of appropriately worded condition(s).**

The Trust's consent as landowner would be required for the runoff shown, even if the proposals seek to utilise any existing outfall. **The Trust has not as yet been contacted by the applicant to confirm that this consent would be forthcoming.** The Trust is not a land drainage authority, and our consent cannot be guaranteed. For more details, our Utilities Section can be contacted by email at utilitiesenquiry@canalrivertrust.org.uk or phone on 07483351479. For more information, the applicant may wish to view the leaflet attached below:

https://canalrivertrust.org.uk/media/document/BQcrktehtD_YrY6pbjchlA/FjMAyJlnWsZI8R4qxFsFANS14FDZbwtOtHlob8i9_c/aHR0cHM6Ly9jcnRwcm9kY21zdWtzMDEuYmxvYi5jb3JlLndpbmRvd3MubmV0L2RvY3VtZW50Lw/0189adf6-9aeb-7c87-8151-fdf3b64aaa29.pdf

NB. We wish to highlight that correspondence internally with our Utilities Section highlights that a foul water connection to the canal from the package treatment plant may be unlikely to gain consent from the Trust in our position as landowner (notwithstanding any planning consent). As a result, the applicant may find it prudent to amend this detail prior to the scheme being given planning consent to avoid delay in any implementation of the scheme. Should they wish to discuss this with the Trust further, our Utilities Section should be contacted by them via the details listed above.

Measures to reduce the risk of pollution towards the canal during and post development

As detailed in our previous response, efforts should therefore be taken to ensure that construction works on will not result in pollution to the wider environment, including the adjacent canal.

Prior to any development taking place on site, we request that a **supporting Construction and Environmental Management Plan should be provided to ensure that watercourses (including the canal) are protected.** This should include details to confirm how silt-laden runoff from exposed soils and dust will be managed. We advise

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that this should take account of the recommendations in paragraphs 6.11 and section 7 of the submitted Phase II geoenvironmental report.

Biodiversity Net Gain

The development would be required to provide BNG improvements as required by schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021).

When considering BNG, the Statutory Biodiversity Metric User Guide (HM Government, 2024) states that the assessment should include adjacent lengths of watercourse in the watercourse module in circumstances where the site boundary crosses into the riparian zone. Table 11 of the guide sets out riparian zone widths, which are 10m from the top of each bank of priority rivers, which would extend into the site boundary.

The development would fall inside the riparian zone of the canal, as the red line boundary is within 10m of the watercourse. The submitted BNG assessment does take this into account, and we note that it identifies that 0.10 additional medium distinctiveness watercourse units are needed to provide the 10% uplift

The Trust may be able to assist the developer in meeting BNG requirements by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations. Developers wishing to discuss opportunities to secure biodiversity units on Trust land should contact bngenquiries@canalrivertrust.org.uk.

Other Comments

In our capacity as Navigation Authority and Landowner of the Dewsbury arm of the Calder & Hebble Navigation, we wish to advise that works in proximity to the canal and the curtilage with our land may require compliance with the Trust's Code of Practice. We therefore request that, in the event of a positive determination, the following informative is appended to the decision notice:

“The applicant/developer is advised to contact the Canal & River Trust’s Works Engineering Team via switchboard on 0303 040 4040 in order to ensure that any necessary consents for works in proximity to the adjacent canal are obtained and that the works would comply with the Trust’s “Code of Practice for Works affecting the Canal & River Trust”

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Simon Tucker MRTPI
Area Planner

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<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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