

**20 Market Place, Dewsbury,
WF13 1DF**

**Planning and Heritage
Statement (including Flood Risk
Considerations)**

BoyleSports (UK) Limited

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LICHFIELDS

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Contents

1.0	Introduction	1
	Biodiversity Net Gain De Minimis	1
	Report structure	2
2.0	Site Description and Background	3
	The Applicant	3
	The Site	3
	Planning History	4
3.0	Proposed Development	5
4.0	Planning Policy Context	6
	National Planning Policy Framework	6
5.0	Planning Assessment	9
	Principle of Development	9
	Consideration of economic benefits	11
	Sustainable development	12
	Design and Amenity Considerations	12
	Heritage Assessment	13
	Flood Risk, Resistance and Resilience	14
6.0	Conclusions	16

1.0 Introduction

- 1.1 This Planning and Heritage Statement has been prepared by Lichfields on behalf of BoyleSports (UK) Limited and accompanies an application for full planning permission seeking the change of use of the ground floor of 20 Market Place, Dewsbury, WF13 1DF ('the site') from Use Class E (Commercial, Business and Services) to Sui Generis (Betting Shop).
- 1.2 External alterations to the appearance of the application site are proposed to enable the unit to be used as a licensed betting office. The application also seeks Advertisement Consent.
- 1.3 The proposed description of development is:
- 'Change of use from Use Class E to Sui Generis (betting office), external alterations, and advertisement consent.'*
- 1.4 This Planning Statement should be read in conjunction with the documents forming part of the enclosed planning application:
- 1 Application Forms and Certificates
 - 2 Location Plan (MAP/270525/01)
 - 3 Block Plan (MAP/270525/02)
 - 4 Aerial Block Plan with labels (MAP/270525/03)
 - 5 Proposed Shopfront Alterations and Signage Details (Existing and Proposed Front Elevations) (FINAL/NL/270525/501A)
 - 6 Existing Front Elevation (NL/270525/102)
 - 7 Existing Rear and Side Elevations (FINAL/NL/270525/502)
 - 8 Proposed Ground and First Floor Plan (FINAL/NL/270525/500A)
 - 9 Existing Ground and First Floor Plan (NL/270525/101)
 - 10 Proposed A/C and Satellite Dish Positions (FINAL/NL/270525/503)
 - 11 Crime Prevention Statement (Prepared by BoyleSports)

Biodiversity Net Gain De Minimis

- 1.5 Biodiversity Net Gain (BNG) is now mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). Some types of development are exempt from having to demonstrate BNG, including developments below the de minimis threshold.
- 1.6 The proposed development would not impact any onsite priority habitat, and it impacts less than 25 square metres of onsite habitat that has biodiversity value greater than zero and less than 5 metres in length of onsite linear habitat. Therefore, the development qualifies for the de minimis exemption for mandatory BNG in line with Regulation 4 of The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

Report structure

- 1.7 This statement is structured as follows:
- 1 **Section 2:** provides an overview of the applicant and describes the site and its surroundings;
 - 2 **Section 3:** describes the proposed development;
 - 3 **Section 4:** sets out the planning policy context;
 - 4 **Section 5:** provides a planning assessment; and,
 - 5 **Section 6:** outlines our conclusions.

2.0 **Site Description and Background**

The Applicant

- 2.1 Boylesports (UK) Limited provides gambling and betting services and offers a wide range of betting opportunities in horse racing, football, tennis, golf, rugby, cricket, basketball and numbers betting. Boylesports serves customers worldwide.
- 2.2 Founded in 1989 by John Boyle, the business has grown to over 300 shops in Ireland, also offering telephone, mobile and online betting and gaming services in Ireland, the UK and a range of international markets.
- 2.3 More recently, the business purchased a group of 13 shops in the Birmingham area in 2019, which saw the start of their expansion in the UK. Geographic coverage has widened in recent years with additional locations carefully chosen to open additional shops, with the current UK estate size approaching 70 shops. The business seeks to continue this expansion within selected locations.

The Site

- 2.4 The site is located at 20 Market Place, Dewsbury. The site is located within Dewsbury Town Centre and within its Primary Shopping Area and Secondary Shopping Frontage.
- 2.5 20 Market Place has operated as a bank since 1986, with the most recent occupant being Lloyds Bank, which vacated the unit in March 2025. The unit has been vacant for 7 months following this closure.
- 2.6 The site is located in Dewsbury Town Centre Conservation Area.
- 2.7 Although the site is not listed, there are a number of listed buildings in close proximity of the site, including:
- 14 and 16 Market Place (Grade II)
 - 26 Market Place, 1, 3 and 5 Market Street (Grade II)
 - 30 and 32 Market Place (Grade II)
 - Pair of Telephone Kiosks on Central Reservation (Grade II)
 - The Black Bull Public House (Grade II)
 - 15, 17, 19 and 21 Market Place (Grade II)
 - 29 Market Place (Grade II)
 - 27 Market Place (Grade II)
- 2.8 A Site Location Plan (MAP/270525/01) is enclosed with the planning application which identifies the location and extent of the site.
- 2.9 The site is located in Flood Zone 2.

Planning History

- 2.10 A review of Kirklees' online planning register has been undertaken, which has identified 4 applications for illuminated and non-illuminated signage at the site between 1986 and 2013 – all of which have been approved. A further 3 applications have been identified relating to external alterations between 1996 and 2020 – all of which were approved. This is summarised in the table below.
- 2.11 The site has been in use as a bank since 1986, and therefore, the established use is Use Class E.

Table 2: Site-Specific Planning History

Reference	Description	Decision	Date
86/64/03629/A2	Erection Of Illuminated Sign	Granted Conditionally	6 September 1986
96/62/92487/E2	Installation Of Cashpoint with Disabled Access (Within A Conservation Area)	Conditional Full Permission	27 September 1996
98/64/92929/E2	Erection Of Illuminated Fascia and Projecting Signs (Within Conservation Area)	Advertisement Consent Granted	14 December 1998
2002/64/93676/E2	Illuminated ATM Collar Surround (Within a Conservation Area)	Advertisement Consent Granted	21 November 2002
2002/64/92008/E	Erection Of Illuminated Signs (Within A Conservation Area)	Advertisement Consent Granted	18 December 2012
2013/64/90020/E	Erection Of Illuminated and Non-Illuminated Signs (Within A Conservation Area)	Advertisement Consent Granted	23 April 2013

3.0 Proposed Development

- 3.1 The application seeks planning permission in full for the change of use of the ground floor of 20 Market Place from Use Class E (former bank) to Sui Generis to enable the premises to be used as a licensed betting office.
- 3.2 Permission is also sought for the following external alterations:
- Installation of two no. satellite dishes affixed to the rear of the building;
 - Two no. internally illuminated fascia signage (max letter height 255mm); and
 - One no. new projecting sign (1m projection).
- 3.3 Planning permission is sought for the installation of two satellite dishes, affixed to the wall at the first and second floor level (900mm SIS dish and 600mm SKY Dish). The details are set out in drawing FINAL/NL/270525/503.
- 3.4 Advertisement Consent is sought for two fascia signs to be installed above the shopfront entrance in the same location as the former signage, as shown in drawing FINAL/NL/270525/501A. The dimensions of the fascia signs are set out in Table 3 below.
- 3.5 New fascia lettering is proposed to cover the absent space where previous fascia boards have been placed. This would consist of fret-cut 5mm-dense acrylic letters (in white and green), overlined with a ribbon of blue acrylic (RAL 270 40 40). These will be attached to the natural stone frontage via locators.
- 3.6 Advertisement Consent is also sought for a small projecting sign. The dimensions are listed below.
- 3.7 Both proposed signs are to be internally illuminated with a maximum luminance level to be 250 cdm².

Table 3: Fascia Sign Dimensions

Sign	Width	Height	Depth	Max height letter
Each Fascia Sign	1785mm	350m	60mm	255mm
Projecting Sign	800mm	800mm	50mm	175mm

Source: drawing FINAL/NL/270525/501A

4.0 Planning Policy Context

4.1 This section of the Planning Statement outlines the relevant local and national planning context for the application, as well as other material considerations.

4.2 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise.

National Planning Policy Framework

4.3 The National Planning Policy Framework (December 2024) sets out the planning policies for England and, which underpin both plan-making and decision-taking. It is a material consideration in determining planning applications. The sections listed below are considered of relevance to the determination of the development proposal:

- Section 2 – Achieving sustainable development;
- Section 6 – Building a strong, competitive economy;
- Section 7 – Ensuring the vitality of town centres; and,
- Section 12 – Achieving well-designed places.

4.4 The central aim of the NPPF is to establish a presumption in favour of sustainable development. Paragraph 8 sets out the three overarching objectives of sustainable development which underpin the planning system; these are interdependent and need to be pursued in mutually supportive ways:

- *“An economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *“A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural wellbeing; and,*
- *“An environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*

4.5 Providing further support for building a strong, competitive economy, paragraph 85 states that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. To enable this, significant weight should be placed on the need to support economic growth and productivity, taking into account local business need and wider opportunities for development.

- 4.6 To ensure the vitality of town centres, paragraph 90 states that planning policies and decisions should support the role that town centres play at the heart of their local communities, by taking a positive approach to their growth, management and adaptation.
- 4.7 Annex 2 of the Framework identifies leisure development as a ‘main town centre use’ which, in our view and as supported in planning appeals, includes betting offices.
- 4.8 In terms of achieving well-designed and beautiful places, paragraph 135(c) states that planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting.

Statutory Development Plan

- 4.9 The Development Plan for the site comprises the Kirklees Local Plan (adopted February 2019). The Kirklees Local Plan (KLP) is formed by the Strategy and Policies document, Allocations and Designations document and associated Policies Map.
- 4.10 The key policies relevant to the consideration of the proposal are:
- **Policy LP7 (Efficient and effective use of land and buildings)** seeks to encourage the reuse or adaptation of vacant or underused properties.
 - **Policy LP13 (Town Centre Uses)** – identifies Dewsbury as a Principal Town Centre. Principal Town Centres are the main focus in Kirklees for the provision of financial and professional services; offices, entertainment; sport, leisure, arts, culture and tourism facilities; further and higher education; and health services.
 - **Policy LP14 (Shopping Frontages)** – defines Primary Shopping Areas, Primary Shopping Frontages and Secondary Shopping Frontages within Principal and Town Centres.

“Within the Secondary Shopping Frontages as defined on the Town Centre Maps, at street level, proposals for retail and other main town centre uses will be acceptable provided they meet criteria a, taking into account criteria b and c:

 - a whether the proposal would lead to a dominance of non-retail uses in a particular frontage which would undermine the retail core and function of the Primary Shopping Area;
 - b the nature of the proposed use, including the associated level of activity, hours of operation, whether a shop front would be incorporated and whether it would complement neighbouring uses; and
 - c in all cases proposals and changes of use shall seek to either retain, enhance or replace to improve shop front design and layout.”
 - **Policy LP16 (Food and drink uses and the evening economy)** – seeks to ensure that the concentration of food and drink as well as 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.
 - **Policy LP18 (Dewsbury Town Centre)** – 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 centre uses.

- **Policy LP24 (Design)** – seeks to ensure that development proposals are of good design.
- **Policy LP25 (Advertisements and Shop Fronts)** – sets out criteria for the design of shop fronts and advertisements. It states:

“Shop fronts, signs and advertisements make a significant contribution to the character and local identity of the district's town centres.

- 1 *The development of new or replacement shop front units and display of advertisements will only be permitted if they satisfy the following criteria:*
 - *the design is consistent with the character of the existing building in terms of scale, quality and use of materials;*
 - *proposals respect the character of the locality and any features of historic, architectural, cultural or other special interest;*
 - *the shop fascia is designed to be in scale, in its depth and width, with the façade and street scene of which it forms part.*
 - 2 *Proposals for the alteration of existing shop fronts or installation of new shop fronts and display of advertisements on a Listed Building or within a Conservation Area should preserve or enhance the character and appearance of the building, the area in which it is located and any features of architectural or historical interest. Existing traditional shop fronts shall be retained and restored unless exceptional circumstances apply. Proposals for new shop fronts and advertisements must be of a high standard of design and be appropriate in style, scale and materials to the building and its setting.”*
- **Policy LP27 (Flood Risk)** – outlines how proposals at risk of flooding should be considered.
 - **Policy LP35 (Historic Environment)** - seeks to preserve and enhance the historic environment.

Dewsbury Town Centre Conservation Area Appraisal

- 1.2 The Dewsbury Town Centre Conservation Area Appraisal sets out the special interest of the conservation area and is a relevant consideration for applications for external alterations or advertisement consent within the conservation area.

5.0 **Planning Assessment**

Principle of Development

5.1 Policy LP13 of the Kirklees Local Plan Strategy and Policies direct new retail and main town centre use development towards the defined hierarchy of centres. The application site is located within Dewsbury town centre, the highest centre in the hierarchy meaning that the proposal is in accordance with Policy LP13 in so far as the sequential site selection is concerned. Likewise, the proposal as a leisure use is a main town centre use, as defined by Annex 2 of the NPPF – again, demonstrating compliance with the LP13.

5.2 Policy LP14 of the Kirklees Local Plan addresses shopping frontages within Primary and Secondary Shopping Areas, requiring the retention of active ground-floor uses and a strong retail core. Policy LP14 was drafted prior to changes to the Use Classes Order in 2020, and the adopted policy position in respect of the application of non-retail to A1 does not sit comfortably against Use Class E, which seeks to provide greater flexibility for changes of use.

5.3 Therefore, it is considered that Policy LP14 is out of date as it has a focus on retail uses which does not align with the NPPF. The NPPF has a broader definition of what uses are appropriate within centres and seeks that ‘main town centre uses’ are directed towards identified centres (paragraph 90, part d). Annex 2 of the NPPF identifies leisure development as a main town centre use, which we consider to include betting offices. As such, we consider that the correct interpretation of ‘non-retail’ uses within Policy LP14 are those uses that fall outside of Use Class E.

5.4 Based on the above interpretation of Policy LP14, the criteria for allowing the establishment of new non-retail uses in the town centre are assessed below with regard to this proposed change of use application:

- a **Criteria a seeks to ensure proposals do not lead to a dominance of non-retail uses in a particular frontage.**

A usage review of the secondary shopping frontage, using the GOAD plan (November 2024), shows that non-retail uses make up only 12.8% of the units, as displayed in the table below. Accordingly, the proposal would not lead to a dominance of non-retail uses and therefore complies with this criterion.

Table 4: Review of Secondary Shopping Frontages

Uses	Number	Percentage
Non-retail (Sui Generis eg. Public Houses, Hot Food Takeaways)	19	12.8%
Class E	84	54.6%
Vacant / Under Alteration	46	30.9%
Total	149	100%

Source: GOAD Plan November 2024

Even if the Council were to take the view that Policy LP14 should be interpreted as currently drafted i.e. A1 vs non-retail, it is important to highlight that the former use the site as bank means that the application site already comprises a non-retail use meaning that the policy effect against LP14 is neutral.

b Criteria b seeks to ensure proposals are compatible with neighbouring uses.

The site lies within a defined town centre, where leisure uses are acceptable and compatible with other town centre activities. The proposed betting shop would increase public footfall and contribute to an active frontage. It would therefore not conflict with adjacent uses.

c Criteria c seeks to retain and enhance shopfronts.

This criterion will be satisfied by bringing back into use a vacant site, improving the existing shopfront and reintroducing the active frontage and the continuity of façade treatment.

5.5

Policy LP16 seeks to ensure that the concentration of licensed entertainment uses does not result in harm to the character, function, vitality and viability of the centre, either individually or cumulatively by assessing compliance with seven criteria as set out below:

a Number, distribution and proximity of other comparable uses

The town centre currently hosts three existing betting shops. The introduction of a further betting shop would increase the share from 1.4% to 1.9% of all units. This is a modest change and cannot be said to present an overconcentration.

b The impacts of noise, general disturbance, fumes, smells, litter and late-night activity, including those impacts arising from the use of external areas

Betting offices are not noise generating and whilst they operate until 10pm, it is not anticipated that there will be any adverse amenity impacts given the site's commercial setting in the Town Centre.

c The potential for anti-social behaviour to arise from the development

The accompanying Crime Prevention Statement, prepared by BoyleSports, demonstrates that the operator will implement appropriate management, control and security measures in accordance with Policies LP16 and LP24, ensuring the use does not give rise to community safety issues.

d The availability of public transport, parking and servicing

The site is in a highly sustainable location in the town centre, with great access to public transport, pedestrian routes, and cycling infrastructure. There is also a nearby car park, a 5-minute walk from the site, as well as excellent service provision in this area.

e Highway safety

The proposed change of use from a former bank is not expected to result in any material increase in vehicle movements compared with the previous use. In addition, the site's proximity to frequent bus and rail services encourages

sustainable travel and reduces reliance on cars, thereby minimising any potential impact on highway safety.

f The provision of refuse storage and collection

Refuse and recycling storage will be internally stored to the front of the shop.

No external alteration is proposed to the front of the building beyond the re-use of the existing shopfront. Satellite dishes will be installed discreetly to the rear, thereby safeguarding the appearance and setting of the Conservation Area.

- 5.6 Policy LP18 states that Dewsbury Town Centre will be a place of vibrancy, vitality and diversity, with a mix of uses to attract visitors and to provide new space for town centre living. The proposal directly contributes to these aims by re-occupying a vacant unit, creating an active frontage to foster pedestrian interaction, and encouraging linked trips with neighbouring shops and services.
- 5.7 It is important to note that betting offices have been recognised through appeal decisions as contributing positively to town centre vitality by attracting regular footfall and encouraging longer visiting times.
- 5.8 For example, in the appeal decision at Harrow (APP/M5450/W/19/3241217), the Inspector concluded that the proposed betting office generated significant footfall within the Metropolitan Town Centre and was the most visited unit among those surveyed.
- 5.9 The Inspector found that customers often visited other nearby shops and services as part of linked trips, demonstrating that betting offices can actively support the shopping function of centres. This confirms that such uses can contribute to vitality, viability and economic activity within established town centres. Applying this reasoning to Dewsbury, the proposed use will help animate the street frontage, support adjacent retailers and reinforce the role of the town centre as a vibrant destination.
- 5.10 With regards to community well-being, the proposal will contribute positively to community wellbeing by bringing a vacant premises back into active use, increasing town centre activity and improving perceptions of safety through enhanced footfall and surveillance. These outcomes accord with the social and economic dimensions of sustainable development set out in NPPF paragraph 8.
- 5.11 Taking the above into account, and having demonstrated compliance with Policies LP13, LP14, LP16 and LP18, the proposed change of use at 20 Market Place to a sui generis betting shop is considered acceptable in policy terms and consistent with the NPPF's overarching objective of ensuring the vitality of town centres.

Consideration of economic benefits

- 5.12 This proposal, through direct investment from BoyleSports (UK) Limited, would contribute to the economic growth of Dewsbury and specifically the town centre area. On average, £300,000 is invested by BoyleSports in the fitting out of each new unit, and BoyleSports pays an average of £9,500 of business rates per unit, per annum, to the Council.
- 5.13 The proposal would create 3 full-time and 3 part-time jobs (including a part-time cleaner). In addition, each new BoyleSports unit creates 26 temporary construction jobs over the 6-8 week construction period (Shopfront & Signage x3, Joiner x3, Electrician x3, Plumber x2,

A/C Contractor x3, Tiler x1, Carpet fitter x2, CCTV & Alarm x2, Technical installation team x3, Painter & decorator x2, General labourer x2). It also creates ongoing, indirect employment, through the supply chain for consumables, waste management and utilities.

- 5.14 It is therefore clear that the proposal would provide for economic growth which aligns with Policy 7 of the Kirklees Local Plan and Strategy ('Economy'), Policy 9 of the Kirklees Local Plan and Strategy ('Retailing and Town Centres') and Chapter 6 of the NPPF (building a strong, competitive economy). The economic benefits relating to the development proposals are a key consideration in the determination of this application and the proposal should be viewed favourably.

Sustainable development

- 5.15 The development will allow for the effective re-use of a previously developed site. This is actively supported by NPPF. Paragraph 89 states that *"the use of previously developed land, and sites that are physical well-related to existing settlements, should be encouraged where suitable opportunities exist."*
- 5.16 This also aligns with Policy LP3 of the Local Plan ('Location of new development'), which seeks that opportunities for new development "on brownfield (previously developed) sites are realised early in the plan". This is supported by Policy 12, which addresses mitigation and adaptation to climate change.
- 5.17 As stated above, the location for this leisure use is considered to contribute to the viability of the Dewsbury town centre and the use of a currently vacant unit (previously developed land) supports the wider objectives of the Council and the NPPF.

Design and Amenity Considerations

- 5.18 Policy LP24 of the Kirklees Local Plan seeks to ensure that all development is delivered to a high standard of design quality. This notion is reiterated in the NPPF, with paragraph 131 confirming that *"good design is a key aspect of sustainable development, [as it] creates better places in which to live and work."*
- 5.19 The proposed scheme has been designed in a way that limits any impact on the building itself and surrounding occupiers and is all proposed within the framing of the shopfront and floorplate of the existing building.
- 5.20 Two new satellite dishes are proposed on the exterior, to the rear of the development; however, these are small in scale and will not be visible to the public. They are necessary to facilitate an appropriate type of development within a town centre environment.
- 5.21 Policies LP24, LP25 and LP35 of the Kirklees Local Plan relate to the appropriate design of new shopfronts and development proposals affecting a designated heritage asset (the proposal being within a Conservation Area). It is considered that the proposed signage aims to create a vibrant, albeit sympathetic, display that complements the Character of the Dewsbury Town Centre Conservation Area and its commercial setting.
- 5.22 A new sensitively designed fascia lettering is proposed to cover the currently absent fascia board. This would consist of fret-cut 5mm-dense acrylic letters, overlined with a ribbon of

blue acrylic (RAL 270 40 40), attached to the natural stone frontage via locators and externally illuminated via an LED trough light. The lettering would comprise 'BoyleSports', the business name, and would consist of individually fret-cut, internally illuminated, white and light blue acrylic letters. The illumination of the sign would be 250cdm, which is considered an appropriate level of luminescence for facias signage along Market Place.

- 5.23 We consider that the scale, design, and illumination of the proposed advertisement and shopfront are appropriate and are consistent with the existing character of Market Place and therefore in accordance with Policies LP24 and LP25.

Heritage Assessment

- 5.24 As the site is located within Dewsbury Conservation Area and is within the setting of several Grade II listed buildings, the application is required to conserve elements contributing to their significance, accommodate innovative design where this does not prejudice the significance of heritage assets and an overarching approach to retain the elements of the historic environment which contribute to the distinct identity of Kirklees (in accordance with Policy LP35).
- 5.25 Given that the scheme does not propose any external alterations aside from the installation of new fascia board/signage and two new satellite dishes on the lower flat roof (with no new build elements or changes to the floorplate), it is considered that the proposals result in no discernible harm to the significance of the historic setting.
- 5.26 Therefore, the proposed scheme complies with local policy, the statutory duties under Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant parts, including section 16, of the National Planning Policy Framework (December 2024).

Flood Risk, Resistance and Resilience

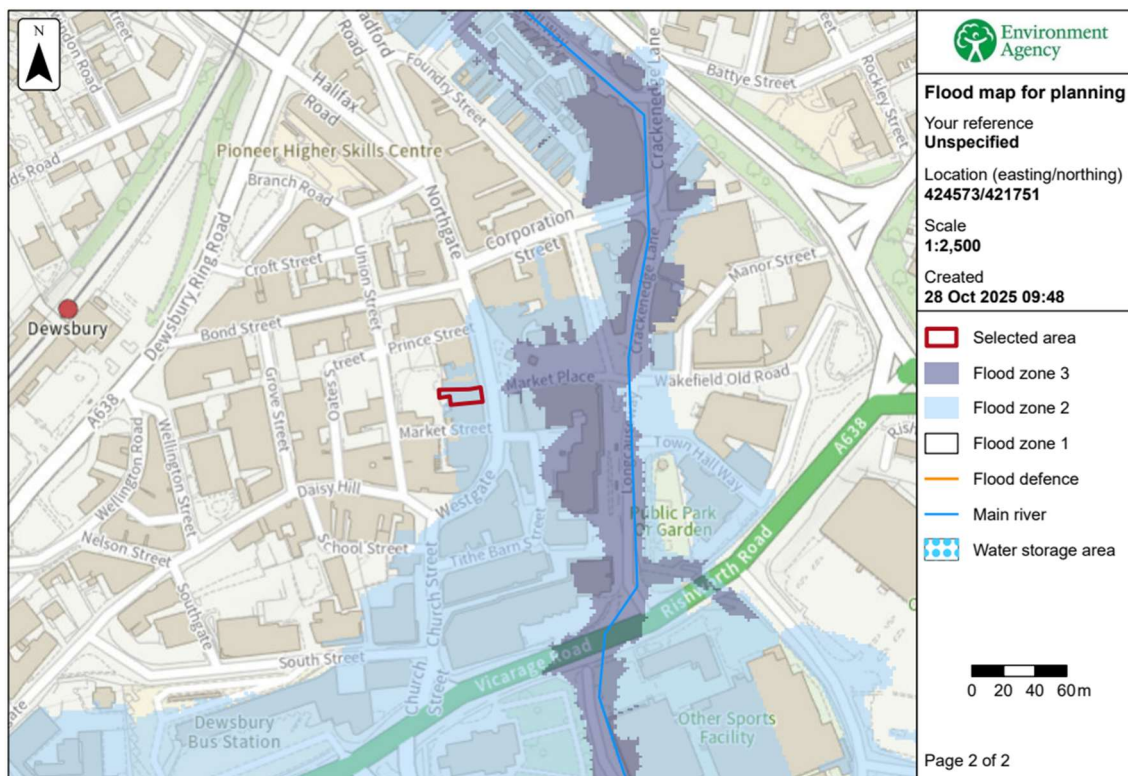


Figure 1: Environment Agency Flood Map for Planning

- 5.27 The River Calder flows through Dewsbury Town Centre, resulting in a large proportion of the commercial core falling within Flood Zones 2 and 3. The Government's Flood Risk Map for Planning identifies the application site as being within Flood Zone 2, as illustrated in Figure 1, indicating a medium probability of flooding. While there is limited flood-defence infrastructure (such as flood walls or embankments) along this reach of the River Calder, the flood risk is moderated by existing flood-warning systems and river monitoring within the catchment.
- 5.28 The proposed use, the conversion of a former bank into a betting shop, is classified as a less vulnerable town-centre use under national flood-risk policy. The site has an extensive history of active use within the area of flood risk. Therefore, the change of use is considered acceptable in terms of maintaining a similar level of flood resistance and resilience.
- 5.29 To improve the flood resistance and resilience, including recoverability of the unit, the proposed betting shop will have limited physical stock by the nature of the proposed use and the proposed materials used both externally and internally will be easy to clean and recover in the event of a flood.
- 5.30 The proposed use would not place additional persons at risk of flooding compared to the previous bank use and will offer a safe means of access and egress.
- 5.31 In addition to this, the proposal would not increase flood risk elsewhere through the loss of flood plain storage or impedance of flood flows.

- 5.32 Given that the site lies within a designated commercial area where retail and leisure uses are encouraged, the development satisfies the sequential test. It is considered acceptable in principle in terms of flood risk and planning policy.

6.0 Conclusions

- 6.1 This Planning and Heritage Statement has described the development proposals at 20 Market Place, for the proposed change of use of a vacant unit from Use Class E to Sui Generis (betting office), external alterations and advertisement consent. It demonstrates that the proposal is compliant with both national and local policy.
- 6.2 The proposed development would create additional employment in the local area and presents significant investment in the fitting out of the new unit. These are matters that are considered material in the determination of the proposal, which can be afforded significant weight.
- 6.3 The scale, design, and illumination of the proposed advertisement and shopfront are appropriate and are consistent with the existing character of Market Place.
- 6.4 The proposed development is a suitable and appropriate use at this location and the benefits of changing the building's use to a licensed betting office on the vitality and viability of Dewsbury Town Centre are clear. As such, we request that planning permission is granted.