



Bowmer and Kirkland Limited **Planning Statement**

Proposed redevelopment of Gomersal St Mary's Primary
School

Shirley Avenue, Gomersal, Cleckheaton, BD19 4NA

March 2026

UK004390.2281



Bowmer and Kirkland Limited Limited

Planning Statement

Proposed Redevelopment of Gomersal St Mary's Primary School, Shirley Ave, Gomersal, BD19 4NA

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Executive summary

This Planning Statement has been prepared by WSP in support of a full planning application for the redevelopment of Gomersal St Marys Primary School.

The existing school buildings are proposed to be demolished and consolidated into a single storey building, with the proposals also including a forest school, play spaces, hard and soft landscaping, and car and cycle parking.

There has been a longstanding requirement for the redevelopment of the existing school and the proposals provide an excellent opportunity to significantly improve the facilities and the overall quality of the school for students and staff. The proposed development will result in numerous benefits for its future users, including an improved learning environment, state of the art sports and teaching facilities, and high quality landscaped external spaces.

The proposals have been subject to detailed pre-application discussions with Kirklees Council and consultation with key stakeholders, and the advice received has enabled the proposals to evolve into a scheme that represents the overall most suitable and deliverable design.

This Statement explains the background to, and the requirement for, the proposed development. It discusses the existing site context and planning history, and provides details of the planning policy context, before describing the proposal in detail. Finally, this Statement provides an assessment of the proposals against planning policy and other material considerations. The proposals comply with the local development plan and the National Planning Policy Framework, and the benefits of the scheme considerably outweigh any perceived adverse impacts.

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INTRODUCTION AND BACKGROUND

- 1.1.1. This Planning Statement has been prepared to support a full planning application at Gomersal St Mary's Primary School in Gomersal, submitted by Bowmer and Kirkland (B+K) on behalf of Gomersal St Mary's School and the Department of Education (DfE) (the Applicants).
- 1.1.2. The application seeks permission for the demolition of the existing buildings on site and their replacement with a new teaching block, hard and soft PE and play spaces.
- 1.1.3. This Statement sets out the detail of the proposed development, establishes the relevant policies against which the application is to be determined, and assesses the acceptability of the proposals in the context of that planning framework and other material considerations.
- 1.1.4. This Planning Statement is structured as follows:
 - Section 2 describes the proposed development
 - Section 3 outlines the pre-application engagement undertaken to date
 - Section 4 sets out the planning policy context
 - Section 5 sets out the planning considerations
 - Section 6 summarises the conclusions
- 1.1.5. Further details of the proposals are set out in the accompanying technical reports and drawings.

1.2 Background

- 1.2.1. Gomersal St Mary's is a voluntary controlled primary school with a 3 to 11 age range intake.
- 1.2.2. The current school building is not fit-for-purpose, and it is financially exhaustive for Gomersal St Mary's in terms of operational and maintenance costs. The redevelopment of the school is therefore being progressed by the DfE under the UK Government's School Rebuilding Programme (SRP), dedicated to rebuilding schools that are assessed to require replacement, based on a building condition assessment. The programme champions the provision of high quality learning environments in line with the UK's latest government standards, alongside low energy solutions delivering net zero carbon in operation.

1.3 Site Context

- 1.3.1. The site is approximately 0.9ha and comprises the school grounds and buildings, as well as an existing car parking area on the opposite side of Shirley Avenue at the site entrance. The existing site has five one-storey buildings plus a staff car park, landscaping and hard and soft play areas. The school currently accommodates 184 pupils (including 12 nursery spaces) aged between 3 and 11 years old.
- 1.3.2. The main access to the site is via Shirley Avenue, which intersects with the north-west corner of the site. The main playing fields are located to the south-east of the site and the

hard play areas are located east of the of the main school building. The school is enclosed from all sides by residential buildings that back onto Gomersal St Mary’s Primary School. Access into the school site itself is restricted to staff visitors, and service vehicles only.

- 1.3.3. The site lies in the centre of Gomersal, a town that lies to the north-east of Cleckheaton. Gomersal is predominately surrounded by other small towns that make up the Local Authority area of Kirklees. The site lies within the settlement boundary and is designated as Urban Green Space.
- 1.3.4. There is no existing community use proposed for the School, apart from those directly associated with the school such as after school clubs, community courses and parents/guardians coffee mornings internally within the School itself. No external community use is proposed.

KEY FEATURES AND DESIGNATIONS

- 1.3.5. The site is not located within an Air Quality Management Area.
- 1.3.6. There are no SSSI’s in close proximity to the site.
- 1.3.7. The site is within Flood Zone 1. This means in any year the land has a less than 0.1% chance of flooding from rivers or the sea. Furthermore, the chance of surface water flooding each year is 1 in 100.
- 1.3.8. There are no single or group protected trees within the site boundary.
- 1.3.9. The site is located within a Coal Mining Development Risk Area.
- 1.3.10. There are no heritage assets located on site however, the following listed buildings are located in reasonable close proximity to the School:
 - Hill Top House, Grade II Listed, LE 1135411. Located approximately 250m north-east of the site.
 - Crowtrees, Grade II Listed, LE 1253961. Located approximately 250m east of the site.
 - Church of St Marys, Grade II Listed, LE 1184613. Located approximately 230m north-west of the site.

1.4 Relevant Planning History

- 1.4.1. Table 1 below demonstrates the site’s planning history, the information available relates only to minor alterations and extensions to the school site.

Table 1 - Key Planning History

Reference	Proposal	Date Approved
2014/62/91765/E	Erection of canopy	15 July 2014
2012/48/90849/E	Installation of double modular classroom	22 May 2012

2011/48/91371/E1	Erection of double modular classroom and associated works	13 July 2011
2010/48/90156/E1	Erections of extensions, re-modelling the existing school, formation of canopies, extending existing car park and landscaping	29 April 2010
2007/48/91733/E1	Erection of single storey extension for use as childrens centre	13 June 2007
2001/62/91913/E3	Erection of entrance extension.	16 August 2001

1.4.2. A letter was submitted to the Council on 26 February 2026 which sought to confirm that an EIA Screening Opinion was not applicable to this proposal. A response was received which did confirm that the proposal did not meet the threshold for EIA screening and as a consequence it also confirmed that the proposed development is not EIA development.

2 PROPOSED DEVELOPMENT

2.1 Description of Development

2.1.1. The description of the proposed development is:

“Redevelopment of school, including demolition of existing buildings and construction of replacement single storey building with external works including provision of hard and soft PE and play spaces, sub-station and associated landscaping, as well as installation of temporary building during construction.”

2.1.2. The submitted Design and Access Statement and drawings prepared by One Environments provide full details of the proposals and each element is summarised below.

2.1.3. Please note that Gomersal St Mary’s School will remain in operation on the site throughout the construction process. The replacement school will continue to only accommodate one-form entry as per the existing school.

Existing Buildings to be Demolished

2.1.4. The proposals include the demolition of four existing buildings; a main building (which incorporates the core functions of the school) and three smaller buildings containing further accommodation and nursery space. The proposals seek to retain the existing Gomersal Children’s Centre located at the northern end of the site, as this does not function as part of the school and is owned by the local authority.

Proposed Building

2.1.5. The proposed new school building will be single storey in height and located to the eastern side of the site, which allows for the rest of the site to be utilised for soft and hard PE spaces, a nature club, forest school and staff car and cycle parking.

2.1.6. Please refer to the submitted floor plans which demonstrate the internal layout of the building, which includes for an assembly hall, staff room, library, reception room, four junior classrooms and 2 infant classrooms amongst others.

2.1.7. The submitted elevations provide details of the materiality and colours to be used, which include stofix brick slip cladding, fibre cement cladding in green and aluminium windows and doors.

2.1.8. The building will accommodate natural vent turrets with actuated dampers, roof lights and syphonic drainage inlets located indicatively in valley gutter to specialist design.

2.1.9. It will have a biosolar roof, which means that the roof includes photovoltaic (PV) panels and vegetation (living roof).

Proposed Sports and Recreational Facilities

- 2.1.10. The proposed replacement sports facilities include a multi-use games area (MUGA) (hard PE) to the south east of the car parking area, and an increase to the current 0.14 hectare playing field provision to 0.17 hectares. The new playing field is proposed centrally within the site, to the west of the school building.

External Works and Landscaping

- 2.1.11. The proposal includes a landscaping scheme that will provide high quality hard and soft external areas for students and staff to enjoy, incorporating native hedge planting, ornamental planting and amenity grass areas, as well as external furniture. In total, the proposals include 56 new trees.
- 2.1.12. The layout retains the existing vehicular and pedestrian access point but provides improved circulation throughout the site, as well as emergency and maintenance access.
- 2.1.13. The proposed site layout will utilise the existing pedestrian entrance, but the parking arrangements will be reconfigured to include 18 spaces, including 2 mobility spaces and 4 Active EV Charging Bays. Cycle parking for 20 bikes will be provided between the site entrance and the school building.
- 2.1.14. A substation is proposed south west of the main access, with its own dedicated access from Shirley Avenue. Further details of the substation are enclosed within this submission.

2.2 Phasing

- 2.2.1. To ensure the ongoing operations of the school, and to limit disruption, the delivery of the development will be phased.
- 2.2.2. Please note that this has required the application boundary to include the car parking area at the front of the site on the opposite side of Shirley Avenue. However, this area will only be used for construction management purposes and will be left in its current condition following the completion of development.
- 2.2.3. Details of the proposed phasing are provided in the submitted Phasing Plans, but can be summarised as follows:

Phase 1

- 2.2.4. Phase 1 relates to enabling works, entrance/access road, drainage diversion and EFAB temporary replacement from Weeks 1-21:
- Site establishment
 - Install new temp EFAB and demolition of EFAB and canopy
 - Drainage diversion
 - Relocation of fence/gate for creation of hoarding area.

2.2.5. Please note that temporary building EFAB will benefit from permitted development rights under Part 4 Class A (temporary buildings and structures) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) once permission for the scheme has been granted. Notwithstanding this, for the avoidance of doubt, the temporary building forms part of the proposals and we are therefore seeking that it will also benefit from planning permission subject to this application being granted. However, given that it is required to be installed as soon as possible, we request that any pre-commencement conditions are worded to allow it to be installed prior to their discharge. Details of the temporary building are enclosed with the submission.

Phase 2

2.2.6. Phase 2 relates to the construction of the new school, attenuation and external works from weeks 22-85:

- Construction of new school
- New attenuation tank (Weeks 57-65)
- Decant into New School (Weeks 84-85)

Phase 3A

2.2.7. Phase 3a relates to the removal of the temporary accommodation within weeks 86-87.

Phase 3B

2.2.8. Phase 3b will see the demolition of the existing school, whilst the new school is in occupation within weeks 88-97.

Phase 4

2.2.9. Phase 4 consists of the completion of external works within weeks 96-115.

Phase 5

2.2.10. Phase 5 consists of the external works completions and refurbishment of the existing Children's Centre in weeks 116-118.

3 PRE-APPLICATION ENGAGEMENT

3.1 Pre-Application Discussion and Engagement

Gomersal St Mary's School and the DfE

- 3.1.1. The proposals are based on a project brief provided by the DfE, but the design process has also involved a series of Client Engagement Meeting between the School, DfE, B+K as the contractor and their advisors. The design went through several iterations as summarised by the accompanying Design and Access Statement by Pick Everard, before the current proposals were agreed upon as the most appropriate, given the constraints and opportunities posed by the existing site.

Local Planning Authority

- 3.1.2. The proposed redevelopment of the school has been the subject to one formal pre-application enquiry submitted to Kirklees Council as the local planning authority.
- 3.1.3. The pre-application was submitted on behalf of the DfE in 2023 (ref: 2023/20975), with written advice issued January 2024. At the time of the enquiry the proposals (known as the Control Option) were for a single storey school within the same site.
- 3.1.4. Officers during the pre-application concluded that in principle the replacement school could be considered acceptable, however further information was requested (including details of Urban Green Space loss and visual and residential amenity impacts) so that officers could make a better assessment of the proposal. This application seeks to address these queries raised at pre-application stage by providing a full suite of technical information as required.
- 3.1.5. The Environmental Health Officer stated in their pre-application response that a Construction Environmental Management Plan (CEMP) should be submitted as part of the planning application in addition to a Lighting Specification Assessment. A CEMP and Lighting Assessment have been submitted as part of this planning application.
- 3.1.6. The Highways officer requested a School Travel Plan as part of the full submission. A traffic survey, Transport Management Statement and Construction Management Plan has also been requested by the Highways officer. These documents have been provided as part of the application submission. The submitted Transport Statement addresses the Highways officer's comments about potential for collisions between pedestrians and vehicles, delivery vehicles access and the potential to increase the intensity of the site.
- 3.1.7. A preliminary ecological appraisal has been submitted as part of the proposal as per the Ecology officer's request.
- 3.1.8. It was noted in the pre-application response that the site located within a High Coal Mining Risk Area and that The Coal Authority would be consulted at the full application stage therefore, a Coal Mining Risk Assessment has been submitted to support the full application submission.

- 3.1.9. The Council also confirmed the technical assessments required to support a subsequent planning application. Following the pre-application feedback the design was developed further to take into consideration the points raised by the Council and the outcome of the technical assessments, this has resulted in the application scheme.

3.2 Stakeholder Engagement

- 3.2.1. In line with Chapter 4 of the National Planning Policy Framework (2024) and the Council's Statement of Community Involvement (2018), the proposal has been subjected to early engagement in an effort to resolve potential issues prior to the submission of the application and to involve the local community and key stakeholders in the propose development to ensure the most appropriate outcome for all.
- 3.2.2. Extensive public engagement was undertaken prior to the submission of this application, with 1,000 flyers distributed to the community, engagement with Councillors, residents, community groups and other local schools, a public website, feedback forms and a public exhibition held on 11 March 2026. An advertisement was also placed in the local newspaper and a telephone number for any queries was available for those who did not have access to the Internet.
- 3.2.3. A total of 95 people attended the public exhibition, who welcomed the investment in the community and asked questions regarding the construction phasing. The extent of the engagement process has been received positively and ongoing conversations are being held with boundary neighbours to ensure that disturbance to them during the construction process is limited.
- 3.2.4. Please see the enclosed Statement of Community Involvement (SCI) prepared by Stonyrock, which provides further details of the public engagement undertaken. TheSCI sets out the feedback that has been received, and explains how it has been addressed and / or incorporated into the proposals.

4 PLANNING POLICY

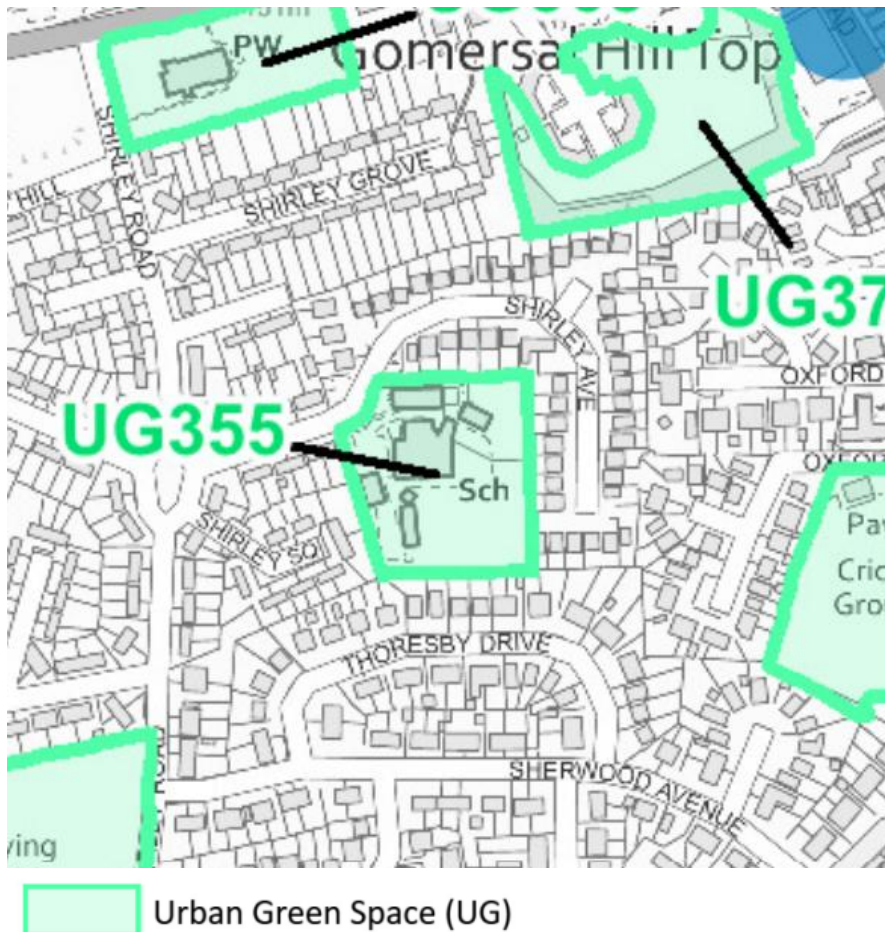
- 4.1.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions on development proposals to be taken in accordance with the adopted development plan for the area, unless material considerations indicate otherwise.
- 4.1.2. This section sets out the relevant policies within the development plan for the area and other material considerations such as national and local policies plus other guidance

4.2 Local Development Plan

Adopted Development Plan for Kirklees

- 4.2.1. The Development Plan for Kirklees comprises Kirklees Local Plan Strategy and Policies (February 2019) and Local Plan Allocations and Designations (February 2019).
- 4.2.2. On the adopted Policies Map, the site sits entirely within Urban Green Space Designation (UG355 – Gomersal St Mary’s Primary School) under Policy LP 61 - Urban Green Space. This is shown in an extract from the Kirklees Local Plan Policies Map below:

Figure 1-1 - Kirklees Policies Map Extract



4.2.3. Policies of most relevance to the site and proposals are listed below:

- LP 1 – Achieving Sustainable Development
- LP 2 – Place Shaping
- LP 3 – Location of New Development
- LP 7 – Efficient and Effective Use of Land and Buildings
- LP 20 - Sustainable Travel
- LP 22 – Parking Provision
- LP 24 – Design
- LP 28 – Drainage
- LP 30 – Biodiversity and Geodiversity
- LP 33 – Trees
- LP 49 – Educational and health care needs
- LP 51 – Protection and Improvement of Local Air Quality
- LP 52 – Protection and Improvement of Environmental Quality
- LP 53 – Contaminated and Unstable Land
- LP 61 – Urban Green Space

Emerging Local Plan

4.2.4. The latest Local Development Scheme for Kirklees Council was approved in March 2024 and sets out the timescales for the emerging Local Plan. Early engagement commenced in November 2024, with the consultation ending in February 2025. The next publication consultation is proposed for December 2026 – January 2027, with submission to the Secretary of State in January 2028.

4.2.5. Given the emerging plan is at such an early stage of its preparation no weight is given to this document at this time.

4.3 National Planning Policy Framework (2024)

4.3.1. The National Planning Policy Framework (NPPF) was updated on 12 December 2024 and is a key material consideration in the determination of planning applications. The NPPF sets out the Government’s planning guidance for England and how this should be applied, of particular relevance to schools are the following paragraphs;

- Paragraph 98, which states that to provide the social, recreational and cultural facilities and services the community needs, planning policies and decisions should plan positively for the provision and use of shared spaces, community facilities and other local services to enhance the sustainability of communities and residential environments. Importantly, they should also take into account and support the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Paragraph 100 states that “It is important that a sufficient choice of early years, school and post-16 places are available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to

meeting this requirement, and to development that will widen choice in education.

Therefore, they should “give great weight to the need to create, expand or alter early years, schools and post-16 facilities through the preparation of plans and decisions on applications; and work with early years, school and post-16 promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”

- Paragraph 128(b), which states that Local Planning Authorities should support proposals to make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space.
- Paragraph 131 states the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- Paragraph 232, states that existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this framework of this framework. Due weight be given to them, according to their degree of consistency with this framework.

Draft National Planning Policy Framework (2025)

- 4.3.2. The NPPF is in the process of being updated, with a consultation draft having been published for comment in December 2025 and closing on 10 March 2026. The government has not stated when the updated NPPF will be published however it is expected in late spring or early summer 2026. Due to the NPPF still being under consultation, limited weight has been afforded to the emerging policies. Nevertheless, we have reviewed the consultation draft and have identified the following policies as relevant to this proposal:

National Decision-Making Policies

- 4.3.3. Draft Policy DM1(1) states that major developments should be informed by early engagement with the local community and the LPA and statutory consultees to identify and seek to resolve key planning matters prior to the submission of the application.
- 4.3.4. Draft Policy DM3(1) encourages LPAs to work with the applicant in a positive and proactive manner when considering development proposals (Part a). Part d suggests that LPAs should consult statutory or internal consultees only when necessary to do so and decisions should not be delayed in order to secure advice from a consultee beyond their statutory deadlines unless there is insufficient information.
- 4.3.5. Draft Policy DM6(3) states that conditions that are required to be discharged before development commences should be avoided, unless there is a clear justification. DM6(4) goes on to state that planning obligations should only be used where it is not possible to address potential unacceptable impacts through a planning condition.

- 4.3.6. Draft Policy DM7(2) confirms that planning decisions should not seek to duplicate or extend controls imposed by separate regulatory regimes.
- 4.3.7. Draft Policy S3(1) states that LPAs should apply a presumption in favour of sustainable development, and proposals that accord with an up-to-date development plan and the decision-making policies in this framework should be approved without delay.
- 4.3.8. Draft Policy S4(1) confirms that proposals within settlements should be approved unless the benefits of doing so would be substantially outweighed by any adverse effects.
- 4.3.9. Draft Policy HC4(1) places even greater weight on the benefit of providing new or improved public service infrastructure (including schools), upgrading this weighting from 'significant' to 'substantial'.
- 4.3.10. Draft Policy P5(1) (part d) highlights development such as education establishments should be informed by the up-to-date information from the police and other relevant agencies about the nature of potential threats and their implications.

4.4 Other Material Considerations

Sport England Playing Field Guidance

- 4.4.1. In the Sport England 'Playing fields policy and guidance' (last updated December 2021) the 2015 Order defines a playing pitch as 'a delineated area which, together with any run-off area, is of 0.2 hectares or more, and which is used for association football, American football, rugby, cricket, hockey, lacrosse, rounders, baseball, softball, Australian football, Gaelic football, shinty, hurling, polo or cycle polo.'
- 4.4.2. Gomersal St Mary's Primary School currently has a playing field of approximately 0.14 hectares. The proposed new playing field would increase this area to around 0.17 hectares. Since both the existing and proposed playing fields are below the 0.2 hectare threshold, consultation with Sport England was not required during the pre-application stage.

5 PLANNING CONSIDERATIONS

- 5.1.1. This section assesses the proposals against the relevant planning considerations in line with planning policy and material considerations.

5.2 Principle of Development

School Rebuilding Programme

- 5.2.1. The development proposals subject to this planning application have been identified as being necessary as part of the DfE's SRP, largely due to the existing buildings being in poor condition and approaching the end of their useable lifespan. There has been a longstanding requirement to improve the school facilities.
- 5.2.2. The proposal, which represents a major investment by the DfE, therefore seek to redevelop the existing site to provide students with and staff with access to modern, state-of-the-art facilities that enhance the quality of learning and teaching, providing a safe and sustainable environment which supports academic, social and emotional development. The proposal will also result in a much more integrated and fully accessible school campus, to the benefit of its students and the local community.
- 5.2.3. The proposal is supported in principle by paragraph 100 of the NPPF, which requires Local Planning Authorities to give great weight to the need to create expand or alter schools through decisions on applications. Furthermore, it is considered that the proposals accord with the policies in the Local Plan as outlined below, thus achieving sustainable development in accordance with Policy LP1. Policy LP 2 requires that development should seek to build on existing strengths and address any challenges to development, which it is considered, that the new proposals for Gomersal St Mary's does.

Urban Green Space

- 5.2.4. The site sits entirely within an Urban Green Space Designation (UG355- Gomersal St Mary's Primary School) under Policy LP 61 – Urban Green Space. Policy LP 61 only permits development proposals which would result in the loss of urban green space if they comply with certain criteria / conditions.
- 5.2.5. Criterion b relates to *“replacement open space, sport or recreation facilities which are equivalent or better in size and quality are provided elsewhere within an easily accessible location of existing users.”*
- 5.2.6. The proposals comply with this criterion and are in accordance with Policy LP 61 because:
- Whilst the designation extends to 0.9ha, not all of this is green. The Baseline BNG Plan (V02) prepared by Estrada shows that, excluding the existing buildings and sealed surface, the existing site provides 4,989sqm of green space. Whereas the proposed provision, as shown on the GA Green Infrastructure Plan (ref: SRP1134-ONE-ZZ-XX-D-

L-0008 P03) excluding the building, permeable paving and sealed surfaces, is 5,728sqm. This represents an increase of 739sqm.

- The green and open space provision will be significantly improved in quality too, with enhanced landscaping and planting, and high quality hard and soft PE provisions.

Previously Developed Land

- 5.2.7. The application site represents brownfield land; the development of which is supported by local and national planning policy. Paragraph 128(b) of the NPPF states that Local Planning Authorities should support proposals to make more effective use of sites that provide community services such as schools, provided this maintains or improves the quality of services provision and access to open space.
- 5.2.8. The proposal for the site will be considerably more efficient footprint, which enables more effective use of external spaces and improves the overall quality of development and amenity across the site.
- 5.2.9. Part c) of LP3 states that development should utilise opportunities on brownfield sites and LP7 of the Local Plan requires ‘the efficient and effective use of land and buildings’ .The redevelopment of the existing Gomersal St Mary’s Primary School therefore accords with Policies LP3 and LP7.

5.3 Design, Scale and Massing

- 5.3.1. The proposal has been designed in the context of national planning policy from the outset, in particular paragraph 131 of the NPPF which requires proposals to achieve good design and high-quality places, whilst also ensuring compliance with the DfE’s spaces standards specifications for primary schools.
- 5.3.2. In producing the design of the proposal, the design team has undertaken a detailed assessment of the existing site context to understand the constraints and opportunities. The design process has also involved consultation with key stakeholders, to fully appreciate local interest and concerns, as detailed in the submitted Statement of Community Involvement.
- 5.3.3. The proposal takes a holistic approach to design, by addressing the existing issues (such as poor condition of the main school teaching block, and a sprawling, piecemeal campus) and producing the most suitable development for its future users and stakeholders. The proposed teaching block represents the most spatially efficient solution for delivering new school accommodation on this constrained site. Its layout maximises the use of available land while ensuring continuity of learning for pupils with minimal disruption during construction. The building’s form, massing and siting have been carefully designed in response to existing site levels, the relationship with surrounding residential properties and existing landscaping features.
- 5.3.4. The form of the new school building is energy efficient, with an ‘I’ shape single storey, with a small two storey portion housing the sports and assembly hall. The layout is efficient, with

an internal cluster based design approach which optimises the use of the school site. Key features within the design proposals include clearly defined teaching clusters, quality spaces for teaching and learning and optimisation of the teaching environments to meet the bespoke requirements of the School.

- 5.3.5. Please refer to the submitted Design and Access Statement prepared by Pick Everard which discusses the design approach in further detail, including overall layout, proposed building, materiality, form and massing and boundary treatments. The Design and Access Statement outlines how the proposal accords with Policy LP24 of the Local Plan which requires good design to be at the core of all proposals.

5.4 Highways and Access

- 5.4.1. Policy LP20 of the Local Plan states that the Council will support development proposals which can be served by alternative modes of transport such as public transport, cycling and walking. The Transport Statement by Eddisons assesses the existing and proposed modes of travel and traffic and transport impacts of the proposal in accordance with the requirements of the user hierarchy within Policy LP20. The report finds that the current modes of travel to the school consist of 32.5% of students travel in via car and 59.7% of pupils walk and 7.8% travel by cycle/scooter/skate. The level of sustainable travel reflects Gomersal St Mary's accessible location and access to suitable pedestrian and cycle infrastructure.
- 5.4.2. A total of 18 car parking spaces, with 2 mobility spaces and 4 Active EV Charging Bays are proposed within the site. Safe and secure cycle parking for up to 20 cycles will be provided at the front of the school building and a further 10 spaces provided to the rear of the proposed building. Provision of pick up and drop off facilities is not being provided on site and the proposals will not increase in any parking demand given there will be no increase in pupil or staff numbers as a result of the proposals. Further, the proposals ensure active travel has been considered fully in line with Policy LP22 which requires full details of the design of proposed parking facilities and provision of car and cycling parking, blue badge spaces and EV charging points.
- 5.4.3. A Travel Plan has been prepared by various staff members and elected pupils which demonstrates the accessibility of the site by sustainable modes. The plan also set outs key issues of travel that students face and objectives to help to overcome any issues identified. The School Travel Plan will be reviewed annually to review progress against agreed targets.
- 5.4.4. Overall, it is considered that the highways and access proposals incorporate a 'vision-led approach' as per the requirements of Paragraph 109 of the NPPF which talks about transport issues being considered from the earliest stages of development.

5.5 Amenity

Internal Amenity

- 5.5.1. The proposed scheme has been designed to significantly improve the experience of the school and its facilities for students and staff within the buildings and around the site. The proposal principally seeks to optimise the teaching environments within the classrooms, with material finishes that add interest, and colours used as wayfinding within the interior of the school. Clearly defined teaching clusters have been developed which are bright, robust and provide an environment that promotes productivity and creativity. Policy LP49 of the Local Plan states that proposals for new or enhanced education facilities are improved. It is considered that the improvements to Gomersal St Mary's satisfy the requirements of this Policy.

External Amenity

- 5.5.2. The potential impact of the proposals on the amenity of neighbouring properties has been a key consideration throughout the design process, given there are residential properties adjacent to all boundaries of the site.
- 5.5.3. The Council does not have design standards specifically for separation distances between single storey school buildings and residential development. However, the distances set out in the Housebuilders Design Guide SPD June 2021 (which generally apply to two storey dwellings) provide a useful benchmark for assessing separation and privacy between the proposed school building and neighbouring dwellings. These require a 12m distance between windows of habitable rooms that face onto windows of a non-habitable room.
- 5.5.4. Site Sections, including detailed Site Sections at the eastern boundary, are submitted with the application, which demonstrate that the nearest residential property to the proposed building is 56 Shirley Avenue, which is 13.4m away, but the facing elevation is the gable end that has no windows. The Eastern Boundary Site Sections also demonstrate the relationship with other properties along Shirley Avenue to the east, including 18.4m to the closest rear elevation, which is the facing elevation of the orangery at number 38. The school is 22m from the original rear elevation of number 38.
- 5.5.5. Given that the classrooms are not habitable residential rooms, and that the school building is primarily single storey in nature, we consider that the proposals comply with the Council's design guidance. Overall, the arrangement achieves suitable separation to protect outlook and privacy and ensures that no materially harmful overlooking or overbearing effects arise for nearby homes. This is helped further by the largely single-storey nature of the building and proposed planting along the boundaries.
- 5.5.6. A daylight and sunlight assessment has also been undertaken in accordance with BRE BR209, considering Vertical Sky Component (VSC), Annual and Winter Probable Sunlight Hours (APSH/WPSH) for affected windows, and amenity sunlight hours for gardens. The assessment demonstrates that none of the surrounding windows requiring assessment

would experience a noticeable adverse impact in terms of daylight or sunlight. All gardens would continue to receive at least two hours of direct sunlight on 21 March over 50% of their area, in line with BRE target values. As such, it can be concluded that the proposal is compliant from a daylight and sunlight perspective when considered in line with BRE BR209, which is the relevant guidance to be used for planning purposes.

Noise

- 5.5.7. The submitted Noise Impact Assessment by Ramboll assesses the noise impact from mechanical plant and external sports areas associated with Gomersal St Mary's in accordance with the Kirklees Council published Noise Design Advice and planning conditions relating to plant noise for recent similar developments in the area.
- 5.5.8. The assessment found that road traffic is the primary source of noise affecting the site. The new school layout will not significantly affect the noise impact of the majority of general playground and sports areas. Whilst the school field will extend slightly further north and therefore closer to the dwellings to the West, its hours of use will remain as per the existing uses therefore the noise impact during the school day is unlikely to be significantly affected. Furthermore, as per the existing situation, there is no community use proposed for the external areas.
- 5.5.9. The assessment summarises that overall there is not expected to be a significant impact in terms of noise upon surrounding residents as a result of the proposal.

Construction Stage

- 5.5.10. The application submission also sets out the proposed approach to managing potential disruption and effects on amenity, in the enclosed Construction Environmental Management Plan (CEMP).
- 5.5.11. As the school will remain operational on the site throughout the construction period, careful consideration has been given to avoiding impact and disruption on users of the school and surrounding roads.
- 5.5.12. The CEMP identifies the impacts and relevant mitigation that will be implemented by B+K throughout the project to minimise the impact to the local environment from the construction activities. It provides details of the following:
 - Construction Impacts
 - Construction Mitigation
 - Noise Management
 - Dust Management
 - Vibration Management
 - Surface Water Management
 - Construction Logistics
 - Waste Management

5.5.13. In light of the above, the application package demonstrates that minimal impact will be had on the wider environment in relation to noise, vibration, dust and odour and ensures that any impacts are adequately mitigated as required under Policy LP52. Furthermore, the CEMP provides clarification that no impact will be had on air pollution in line with Policy LP51.

5.6 Ecology and Biodiversity

Ecology

5.6.1. The preliminary ecological appraisal and impact assessment by RSK demonstrates that of the 11 buildings on site, only 3 were assessed as being suitable to support roosting bats in 2022. No significant effects on wildlife or biodiversity are expected from the development. An updated bat emergence survey for Building EFAA to confirm conditions on site will need to be undertaken by a suitably qualified ecologist during the bat survey season (May – August).

Biodiversity

- 5.6.2. Policy LP30 of the Local Plan states that development proposals should minimise impact on biodiversity and provide a net biodiversity gain.
- 5.6.3. The Biodiversity Enhancement Plan and associated Metric by Estrada Ecology indicates that the total baseline habitat biodiversity units for the site were calculated at 4.43 units, with hedgerow units being 1.10 units. As a result of the development proposals, post development habitats result in a net loss of 58.80%, with the hedgerow habitats resulting in a net gain of 29.75%. The nature of the site and scheme means that biodiversity net gain will therefore be achieved through off site units, resulting in a scheme that is compliant with national and local planning guidance. In line with the guidance, this will be dealt with as a post-determination matter.

5.7 Landscaping and Trees

- 5.7.1. The proposal includes a high-quality landscaping scheme which has been designed to create a safe, welcoming and functional environment that supports outdoor learning, play, active travel and ecological enhancement across the school site. The layout provides a coherent structure of hard and soft landscape areas that define arrival spaces, play zones, circulation routes, and ecological features. The strategy incorporates retained vegetation, new tree planting, ornamental planting beds, native hedging, and species-rich grassland to improve biodiversity and visual quality across the site, please refer to the submitted Design and Access Statement by Pick Everard for further detailed landscape information. Overall, the site provides:
- Hard and soft PE areas, supporting formal outdoor sport and informal play.
 - Nursery and Reception outdoor play areas, located adjacent to the early years classrooms.

- Nurture Club & Forest School area, offering a dedicated nature-based learning environment.
- Wellness & Prayer Garden, creating a quiet reflective space within the landscape.
- Multi-Use Games Area (MUGA).

- 5.7.2. The submitted Arboricultural Impact Assessment assessed a total of 14 individual trees and 12 groups of trees. Of the individual trees recorded, 2 were Category B and the remaining 12 were Category C. Of the 12 tree groups recorded, 3 were classes as category B features and the remaining 9 were category C. A total of 8 individual trees and four groups of trees will be removed to enable the proposed development, as they sit on the footprint of areas of construction. Only one of these is Category B, whilst the others are under Category C.
- 5.7.3. To mitigate the loss of the trees as stated above, new tree planting (including 56 trees of 350-425cm height and 12-14cm girth), is proposed on the East, South and West perimeters of the site and where possible, the site has sought to retain as many trees as possible in line with Policy LP33 of the Local Plan.

5.8 Sustainability and Energy

- 5.8.1. The energy strategy for the proposals follows the 'Be Lean', 'Be Clean', 'Be Green', 'Be Seen' hierarchy and the development will achieve NZCiO (Net Zero Carbon in Operation) at handover. By prioritising passive design techniques to reduce energy use and carbon emissions, the approach ensures that the construction budget is first targeted to the building fabric, enhancing overall performance. Key passive measures include optimisation of useful daylight to reduce reliance on artificial lighting, using light coloured materials to limit heat absorption, and maximising opportunities for natural ventilation. The proposed external lighting on site is considered to be acceptable from an ecology perspective and the lighting levels will not adversely impact biodiversity enhancements, including those for bats.
- 5.8.2. Active design measures are also incorporated to further improve efficiency. High efficiency air source heat pumps will provide heating and hot water, ensuring that no fossil fuels are directly used in the building's operation. LED lighting is specified throughout and is identified as a cost effective way to reduce electrical consumption. Further energy savings are supported by the inclusion movement sensors and daylight dimming controls. Out of hours zoning of the heating system will ensure that only the occupied areas are heated when the building is in community use.
- 5.8.3. Photovoltaic (PV) panels will be installed to offset energy consumption and further reduce carbon emissions.

5.9 Flood Risk and Drainage

- 5.9.1. The submitted Flood Risk Assessment by LDE confirms that proposals can be delivered safely and without increasing flood risk elsewhere. The site lies entirely within Flood Zone 1, with a very low probability of fluvial flooding, and is not at risk from tidal or reservoir sources. While small, shallow areas of surface water ponding currently occur due to minor

topographic depressions, these will be removed through site re-profiling and managed via the proposed drainage strategy. Groundwater and sewer flood risks are low, with appropriate mitigation and liaison with Yorkshire Water recommended.

- 5.9.2. The proposed 'more vulnerable' educational land use is fully appropriate in Flood Zone 1, meaning neither the Sequential Test nor the Exception Test is required. Recommended measures include setting finished floor levels at least 150mm above the site access road, incorporating a robust surface water drainage strategy, and adopting best-practice groundwater protection measures such as non-return valves and sealed manholes. Overall, the Flood Risk Assessment concludes that the development will be safe for its lifetime, compliant with national and local policy, and will not increase flood risk elsewhere.
- 5.9.3. Policy LP28 of the Local Plan requires for Sustainable Urban Drainage Systems (SUDs) to be incorporated into proposals and to ensure that development does not have a negative impact on water quality. The development proposal for Gomersal St Mary's incorporate SUDs within the landscape and will not result in a change in the local water quality as a result. The Sustainable Drainage Strategy by HEXA sets out that the proposed drainage networks have been modelled to ensure no surcharging in the 1 in 2 year rainfall event, 1 in 30 year storm event and no flooding within the 1 in 100 year storm event. Permeable paving has been proposed for external car parking areas and green roofs have been proposed on the lower roof with filter drains proposed at the base of the existing slope in the South of the site. Attenuation storage tanks will also be required to provide the attenuation requirement. The above measures demonstrate that the proposals have a sustainable approach and that the drainage strategy presents a robust drainage solution adhering to Policy LP28.
- 5.9.4. Paragraph 172 of the NPPF requires proposals to take into consideration drainage and flood risks. Paragraph 172c specifically asks for infrastructure to provide opportunities to reduce the causes and impacts of flooding. Given that the site lies within Flood Zone 1 and purposes to utilise a combination of SUDs features, it is considered that the development will accord with the requirements of Paragraph 172 of the NPPF.

5.10 Ground Conditions and Contamination

- 5.10.1. In support of addressing the requirements of Policy LP 52, which sets out that if development is suspected of being contaminated it will require the submission of appropriate contamination assessments, the application is supported by the following documents:

- Coal Mining Risk Assessment by Sweco
- Preliminary Risk Assessment by RSK
- Geo-Environmental Site Investigation Factual Report by RSK
- Coal Tar Assessment by Roberts Environmental Ltd
- Infiltration Assessment by Roberts Environmental Ltd
- Contamination Assessment by Roberts Environmental Ltd
- Geo-Environmental Interpretative Report by Roberts Environmental Ltd

- Intrusive Coal Mining Risk Assessment (CMRA) and Geotechnical Assessment by Roberts Environmental Ltd

- 5.10.2. In summary, the site is underlain by weathered bedrock and coal measures with multiple voids, indicating variable ground stability and a legacy of historic mining activity. Groundwater was previously recorded at around 8 m below ground level, with perched water evident in shallower deposits.
- 5.10.3. Voids and insufficient intact rock cover mean that stabilisation through grouting is required before construction. Shallow foundations are unsuitable due to fractured coal seams and variable-strength weathered bedrock leading to differential settlement risks. A deeper piled foundation solution (ie CFA) is therefore recommended.
- 5.10.4. A Foundation Works Risk Assessment may be needed to demonstrate that piling will not create pathways for mine or ground gases. It is also recommended that specialist grouting and piling contractors develop detailed designs.

5.11 Health Impact

- 5.11.1. The Health Impact Assessment (HIA) concludes that the Proposed Development will make an overall positive contribution to health and wellbeing outcomes for pupils and staff. The improvements to Gomersal St Mary's CE Primary School through the provision of new, improved and energy-efficient facilities contribute to wider determinants of health by creating a safe, high-quality educational setting and promoting environmental resilience and sustainability.
- 5.11.2. Temporary negative impacts during the construction phase, such as noise, dust, and disruption to pupils, have been identified. These will be managed through the Phasing Plan and Construction Environmental Management Plan (CEMP), which set out mitigation measures to minimise environmental and safety risks. Importantly, the Phasing Plan ensures continuity of education for pupils and staff throughout the construction period and ensures sufficient mitigation of potential negative effects.
- 5.11.3. Additional positive impacts include improved site safety, better open space and sports provision for pupils, and opportunities for local employment initiatives during construction.
- 5.11.4. The scheme complies with Policy LP47 by promoting healthy, active lifestyles and aligns with national policy by improving educational infrastructure and community wellbeing. Overall, the HIA concludes the development will deliver long-term health benefits for pupils, staff, and the wider community.

5.12 Secured By Design

- 5.12.1. Policy LP24 of the Local Plan requires development proposals to minimise the risk of crime by enhanced security and high levels of activity. In accordance with this policy, the submitted Crime Impact Statement sets out how the features of the development reduce the risk of crime. The approach to mitigating security risks has been discussed with the



Designing Out Crime Officer who has confirmed their support for the proposed features. The overall design and layout for the school has been developed, considering safety and security. Boundary fencing and gates are positioned to direct circulation, while internal fence lines and pathways guide users towards the main reception. Boundary fencing will be weldmesh between 1.8m and 2.4m which allows for natural surveillance from residential properties and across the site frontage.

- 5.12.2. Overall, the measures proposed seek to reduce opportunities for crime and antisocial behaviour, support effective site management and contribute to a development that promotes safety, community, confidence and sustainability in line with Policy LP24.

PLANNING BENEFITS AND CONCLUSIONS

- 5.12.3. The proposed redevelopment of Gomersal St Mary's Primary School represents a significant opportunity to replace buildings that are no longer fit for purpose with a modern, efficient and high-quality learning environment.
- 5.12.4. The application has been informed by detailed site analysis, extensive technical assessment and continuous engagement with Kirklees Council, the Department for Education, the School, and other key stakeholders. This process has ensured that the scheme responds appropriately to the site's constraints and opportunities and delivers the most suitable and deliverable solution for the School and its community.
- 5.12.5. The proposals will provide substantial benefits, including the following:
- The delivery of modern, state-of-the-art education facilities, enhancing the quality of teaching and learning environments for pupils and staff.
 - A more efficient and integrated school layout, consolidating accommodation into a single-storey building and improving accessibility across the campus.
 - Improved external spaces, including high-quality hard and soft PE areas, an enlarged playing field, a MUGA, nature-based learning zones, and enhanced landscaping.
 - Enhanced sustainability, with the new building designed to achieve Net Zero Carbon in Operation and significantly improved energy performance.
 - A well-planned construction phasing strategy that enables the school to remain operational throughout the development period.
 - Improved safety, security and site management, incorporating Secured by Design principles and clear circulation routes.
 - Positive health and wellbeing outcomes, as identified in the submitted Health Impact Assessment, through improved active travel, better quality learning and play spaces, and increased access to green infrastructure.
- 5.12.6. The scheme responds positively to planning considerations relating to design, amenity, highways, flood risk, drainage, ecology and ground conditions, supported by a comprehensive suite of technical assessments.
- 5.12.7. The proposals are compliant with local and national planning policy, including strong alignment with paragraph 100 of the NPPF which requires great weight to be given to proposals that create, expand or alter schools. Although the site lies within an Urban Green Space designation, the proposal meets the requirements of Policy LP61 by providing open space that is equivalent or better in size and quality than the existing provision.
- 5.12.8. Considering the overall planning balance, the development delivers significant public benefits, including improved educational infrastructure, enhanced community facilities, and a high-quality, sustainable design that will positively contribute to the long-term needs of pupils, staff and the wider community. Any limited adverse effects are greatly outweighed by these benefits. On this basis, and in accordance with paragraph 11 of the National Planning



Policy Framework, it is respectfully requested that the planning application be approved without delay.

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