
Report of the Head of Planning and Development

STRATEGIC PLANNING COMMITTEE

Date: 31 March 2021

Subject: Pre-application for part redevelopment of Greenhead College, including part demolition and making good, new building, relocated car parking and site access arrangements, and reconfiguration of sports provision at Greenhead College, Greenhead Road, Huddersfield, HD1 4ES

APPLICANT

Galliford Try Building Ltd

DATE VALID

23-Feb-2021

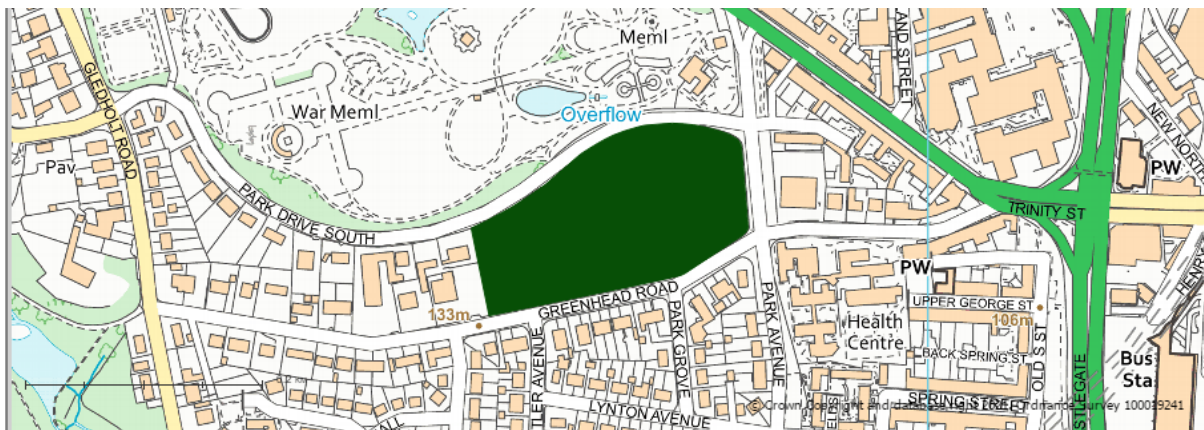
TARGET DATE

22-Mar-2021

EXTENSION EXPIRY DATE

N/A

LOCATION PLAN



Map not to scale – for identification purposes only

RECOMMENDATION: That members note the contents of this report for information.

1.0 INTRODUCTION

- 1.1 This pre-application enquiry is brought to the Strategic Planning Committee to inform members of a potential planning application for demolition and the erection of a new teaching block at Greenhead College.

2.0 SITE AND SURROUNDING

- 2.1 Greenhead College is a large sixth form education facility whose grounds are circa 2.5ha in size. The campus hosts a central agglomeration of buildings which form the primary teaching block, with several satellite buildings. Car parking is located around the site but is focused to the east of the main building. To the campus' west is a large multi-use games area (MUGA).
- 2.2 The site has a substantial stone boundary wall in all directions. The primary access for vehicles and pedestrians is via Greenhead Road (to the site's south), with a secondary access via Park Road South (to the site's north).
- 2.3 The site is within a residential area, with dwellings to the east, south and west. To the immediate north is Greenhead Park. Greenhead Park is a Grade II Listed Park and Garden that hosts several listed buildings. Greenhead College is also within the Greenhead and New North Road Conservation Area and is adjacent to the Springwood Conservation Area.

3.0 ENQUIRY BACKGROUND

- 3.1 An earlier pre-application was submitted on the site in late 2020, also seeking the demolition and erection of a new teaching block. Greenhead College includes various built sections which are reaching the end of their life, notably 1960s laingspan construction areas that are in a degraded state. This amounted to circa 3900sqm of floor space being demolished. The earlier pre-application proposed to demolish these and to erect a modern, purpose-built education block, along with other works to provide an outdoor social space, improve circulation and flow around the campus. The number of students, currently 2505, was stated to not change as part of the proposal.
- 3.2 The previous pre-application included information on several explored options and why non-selected options had been discounted. At the time the applicant's preferred option was to erect the replacement building in the north half of the site, set forward of front of the entrance block and adjacent the boundary wall to Park Drive South / Greenhead Park. The indicative plans showed a split-level structure, at four and five storeys, with a flat roof. The area opened up through demolition would be turned into an outdoor social space, with a cloister / colonnade connecting the remaining buildings. Plans were limited to indicative block plans and massing studies.
- 3.3 The initial enquiry included a draft development phasing plan. Given the need to provide continued education serves, a 3-storey temporary teaching block was proposed, to be sited to the site's west. No detailed elevations or timeframes were provided.

3.4 Meetings took place between the applicant and the LPA, involving planning, conservation and highway officers. It was noted that the site is allocated as Urban Green Space, and the proposal would likely represent a departure from policy LP61 (Urban Green Space) of the development plan. The applicant was advised that sufficient justification would need to be submitted to demonstrate that the public benefits outweigh the final proposal's ultimate harm to the Urban Green Space. Comments were also made over the impact upon sports provision. Amongst other matters, concerns were expressed over the scale of the new building and its proximity to Greenhead Park (and, to a lesser extent, to temporary teaching block's impact), from where it was anticipated to appear unduly prominent and dominant. It was advised that the scale of the building be reduced along with requiring a considered design to ensure it harmonised with the historic context. Recommendations and feedback were also given on various other material planning matters including, but not limited to, Highways. A conclusive formal pre-application letter was issued.

4.0 PROPOSAL

4.1 Following on from the initial pre-application and the LPA's advice, an amended proposal has been submitted under the current pre-application enquiry.

4.2 The extent of demolition remains as previously proposed, showing the removal of circa 3900sqm of existing floor space (subject to change). The connecting cloister / colonnade has been superseded by an infill section to link the buildings. The outdoor social space would include the remaining footprint of the demolished building, plus much of the land previously proposed to host the initial preferred option teaching building.

4.3 The new preferred option building is located away from the north boundary but would remain to the front of the main block. It would be built over the site's existing principal car park, adjacent to the south and east boundaries. The building's scale has been reduced compared to the original design. It would have a footprint of circa 1500sqm, with a height of 4 storeys therefore providing circa 6000sqm of floor space in total. The roof remains flat, although parapet detailing has been indicated. The site's existing vehicular access would be converted to the primary pedestrian access.

4.4 Car parking would be re-located to the west of the site, which currently hosts a large MUGA. The MUGA would be reduced in scale and moved to the north, on currently vacant land. The replacement parking is intended to replace spaces at 1:1 (retained at 159 on site spaces). A pavilion used for changing and storage would be demolished and may be proposed to be replaced, although no details have been shown at this time. An existing closed access from Greenhead Road would be re-opened and enlarged / re-aligned, to ensure modern standards, to access the car park.

4.5 Based on the current proposed layout and indicative development phasing plan, no temporary teaching accommodation would be required.

5.0 CONSULTATION RESPONSES

5.1 As part of the current and earlier pre-application enquiries the following consultees from within the Council have been contacted to seek their advice on the potential implications of such development in this location and the reasonable measures required to mitigate the associated impacts:

- K.C. Conservation and Design
- K.C. Crime Prevention
- K.C. Ecology
- K.C. Environmental Health
- K.C. Highways Development Management (HDM)
- K.C. Landscape
- K.C. Lead Local Flood Authority
- K.C. Planning Policy
- K.C. Sports and Physical Activity
- K.C. Trees

5.2 The advice provided by these consultees is set out within the appraisal below where relevant.

5.3 Local ward members were notified of both the original and current pre-applications. The site falls within Greenhead Ward. Given the proximity to Newsome Ward, Newsome members were also notified.

5.4 Cllr Pattison responded to the initial enquiry, where she commented on the existing parking attributed to the school, with student parking causing difficulties and should ideally be accommodated on site. Cllr Pattison considered the existing in / out arrangement for both cars / pedestrians to be poor. Finally, Cllr Pattison requested that any artwork on the building be retained and re-used.

6.0 MAIN ISSUES

Principle of development

Urban Green Space, educational development, and the impact upon sports facilities

6.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan, the Kirklees Local Plan, unless material considerations indicate otherwise. The NPPF is a material consideration in planning decisions.

6.2 The pre-application enquiry site falls within land allocated as Urban Green Space (UGS) within the Local Plan. UGS is governed by Policy LP61, which outlines when UGS may be developed. Based on the details held at this time, officers do not consider the proposal to comply with the requirements of LP61. Furthermore, officers do not envision that a justification could be submitted

that would demonstrate that it does. The proposal would therefore represent a departure from the Local Plan. This has not currently been disputed by the applicant. Nonetheless, the LPA may depart from development plan policy where material considerations indicate that the plan should not be followed.

6.3 Initial justification for the departure has been offered by the applicant. This principally relates to the need to provide enhanced education facilities at Greenhead College. This includes the need to replace buildings which have reached the end of their lifespan and are no longer fit for modern education purposes. The provision of enhanced education facilities would carry material weight, in accordance with LP49 (educational and health care needs), and could form the basis of an argument to justify a departure from LP61. The submitted details are a suitable starting point, but the LPA would expect further and more detailed context, explanation, and justification to be provided with any subsequent application. Officers have advised the applicant to consider the following:

- An assessment of the purpose of the UGS allocation at present.
- Elaboration on the need for the development; more details on the issues with the in-span construction and how the proposal would lead to an enhancement of education facilities.
- Whether any other options off-site have been considered and, if so, why they were discounted.
- Demonstrate how the proposed design has been reached, outlining how the UGS has been considered within the design.
- An assessment of how the proposal would impact upon the purpose of the UGS, as previously made.

6.4 As noted, a proposal providing education enhancements is a material consideration and would add weight in favour of the development, if suitably evidenced. LP49 establishes a general principle in favour of education development, subject to the following criteria:

Proposals for new or enhanced education facilities would be permitted where:

- a. they would meet an identified deficiency in provision;*
- b. the scale, range, quality and accessibility of education facilities are improved;*
- c. they are well related to the catchment they are intended to serve to minimise the need to travel or they can be made accessible by walking, cycling and public transport.*

- 6.5 The applicant has been advised that the above criteria should be directly addressed within a subsequent application's supporting statement. In regards to the NPPF, paragraph 94 also adds weight to supporting education development, requiring that:

It is important that a sufficient choice of school places is 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. They should:

- a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*
- b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.*

- 6.6 Conversely, the proposal also includes a reduction in the size of the site's MUGA. Harm to the site's ability to offer sports and recreation would materially weigh against the proposal. Local and national policy seeks to support sports and physical activity, for social and health gains. LP47 sets out how the council aims, with its partners, to create an environment which supports healthy, active and safe communities and reduces inequality, followed by a variety of criteria. LP50 relates directly to sport and physical activity.

Sport and leisure facilities would be protected where they are needed to meet current and future demands. The loss of open space, sport and leisure facilities would only be allowed where:

- a. an assessment clearly shows that the site is no longer required to meet an identified need for open space, sport, or recreation use; or*
- b. equivalent or better replacement facilities in terms of quantity and quality are provided to compensate for those lost as a result of the development and these are within an easily accessible location for existing and potential new users; or*
- c. the proposal is for an alternative sport, leisure or open space use that is needed to help address identified deficiencies and clearly outweighs the loss of the existing facility.*

Any proposed loss of community sports facilities should be supported by a detailed needs assessment report.

The enhancement of outdoor sports facilities through improving the quality and management of sites as identified in the Playing Pitch Strategy would be supported.

6.7 The Greenhead College facilities are recorded within the Playing Pitch Strategy, where it recommends:

'Protect - Well used pitches, protect for College use'

6.8 Notwithstanding the above, it is accepted that the proposal would be a reduction, not a loss, as a smaller MUGA would be formed. Regardless, any subsequent application is expected to demonstrate that the change to the MUGA would not materially harm health and sport provision for the college would comply with LP47 and LP50.

6.9 On the matter of community use, the current MUGA is limited to school use only via planning conditions. This was on the basis of highway safety and amenity of neighbouring dwellings. As the MUGA would, as currently proposed, be adjacent to the car park (whereas before it was well removed) and be further away from 3rd party residents, the applicant has been advised to consider whether a public element could be incorporated. This would, if supported, help offset any harm caused through the reduction in size proposed.

6.10 Sport England would be consulted at application stage and would likely comment on the proposal's sports' impact.

6.11 In summary, at this time and based on the detailed held, whether the principle of development is acceptable cannot be fully assessed. Officers would have to weigh the proposal's harm to the Urban Green Space and breach of LP61, plus the impact upon the MUGA and policies LP47 and LP50, against the educational needs of the school, to be outlined within supporting information with any subsequent application.

Impact on visual amenity, including the historic environment

6.12 LP24 of the KLP states that *'Proposals should promote good design by ensuring: the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape'*. LP35 relates to the historic environment and outlines that *'proposals should retain those elements of the historic environment which contribute to the distinct identity of the Kirklees area'*. The policy outlines various criteria to achieve this.

6.13 The proposed development is within the Greenhead Conservation Area, lies adjacent to the Springwood Conservation Area and is also adjacent to the Grade II Listed Greenhead Park which hosts several separate listed buildings. LP35 requires that proposals maintain and reinforce local distinctiveness and conserve the significance of designated and non-designated heritage assets. For the avoidance of doubt, officers consider that the college's main entrance building is considered to be a non-designated heritage asset and should be treated accordingly. As a consequence of the site's close relationship with the historic environment the proposal's impact upon all identified heritage assets would need to be addressed within an adequate Heritage Impact Assessment at application stage.

Demolition

- 6.14 Regarding the proposed demolition of part of the existing structure, from a general design perspective, this is not opposed. Nonetheless, the building is within a Conservation Area: therefore, the impact of the demolition and the heritage value of the building to be demolished should be considered and weighed within the Heritage Impact Assessment. The treatment / repair of newly exposed elevations on buildings to be retained should also be detailed (and may form a public benefit).
- 6.15 The building to be demolished previously hosts an art installation (a statue affixed to building) although it is understood this was removed sometime ago. Nonetheless, LP24(j) supports the provision of public art. The inclusion of replacement or additional features of art around the site, student made or otherwise, would be welcomed and would enhance the scheme. This does not need to be fully detailed at application stage, but should it be included areas 'to host public art' should be identified on plan.

The new building

- 6.16 The applicant has evidently considered the concerns raised within the previous pre-application. Furthermore, it is accepted that a full set of complete plans have not been provided to date, to enable a comprehensive assessment of the proposal's impact. Nonetheless, officers are required to comment on the details before them. While many of the issues raised previously have been addressed, officers do have remaining concerns over the visual impact of the proposed building. These concerns can be broken down to the building's layout, materials, scale and roof form.
- 6.17 First considering the proposed layout, it is accepted that the new location would have a lesser impact upon the designated heritage assets of the Grade 2 Listed Greenhead Park, and the wider Greenhead Park / New North Road Conservation Area. Furthermore, the proposed location allows for a lower and smaller scale building and would be built atop a car park, which neither adds to the heritage value of the area nor is visually attractive. Conversely, it is sited directly in front of the main entrance building, harming views of the frontage, which officers have identified as a non-designated heritage asset and would still be prominent within the Conservation Area.
- 6.18 The applicant has made efforts to minimise the impact upon the main entrance building. This includes having a cantilever entrance section, to partially allow views through, as well as re-locating the main entrance.
- 6.19 In regards to materials the applicant is currently proposing a buff brick, of a colour to match the natural stone of the host building. Officers have expressed a strong preference for natural local York stone, which the applicant opposes on grounds of wanting a modern subservient and complementally material, as opposed to a replicated pastiche.

- 6.20 Progressing to scale and roof form, the building would be 4 storeys with a flat roof design. While 1 storey less than the original pre-application's design, it remains a new large building above the typical scale of structures within the Conservation Area which would be visible from various vistas within the Greenhead Park / New North Road Conservation Area, as well as the neighbouring Springwood Conservation Area. Despite most buildings within the campus having three floors, they predominantly appear two storeys in height and incorporate teaching into their pitched and hipped roof spaces. This is achieved through rooflights, dormers, 2.5 storey design or a mixture. As a result of these design features, the evident scale and mass of the site's existing buildings are kept to a minimum. There is noted to be one 4 storey structure on site, however it has all the aforementioned design features. The one existing 4 storey structure on site includes all of these features. It is also faced in lightweight subservient materials and is set back in the site, adjacent to a level change and buildings, which step up to its height. These all reduce its visual impact.
- 6.21 The proposed building would be a true four storey structure, with flat roof and bulky design. The height, scale, and massing of such a structure would, in officer's view, not harmonise well with the other buildings on site. The adjacent, and also modern, Rostron building does host a flat roof, a similar square design and lacks architectural interest. However, it is considered the least attractive building on the site and it should not be replicated. In justification of the Rostron, it is smaller and set further away from the site's other buildings, features the current proposal would not benefit from.
- 6.22 Whether appropriate architectural design could overcome these concerns, while retaining the mass and roof form, would need to be explored at application stage, as currently full detailed plans are not held.
- 6.23 Officers have shared these concerns with the application, who has provided the following summary statement on their design reasoning (to be elaborated upon at application stage).

The Department for Education (DfE) and their technical advisors undertook an analysis of the existing Greenhead campus to identify those buildings beyond their service life and eligible for replacement under their School Building Replacement programme. Based on this assessment a number of Laingspan structures on the site were selected for replacement. Due to the interdependent nature of a number of the structures adjoining the Laingspan structures, the Science Building, Student Social Area and Main Hall block were identified for replacement.

All replacement accommodation has to be delivered to the current national standards developed by the DfE which sets clear performance and space requirements for typical teaching and support spaces.

Three locations on the site were identified as potential development areas.

1. *The location of the existing blocks proposed for replacement [the siting subject to the initial pre-application]*
2. *The field/pitch areas to the west of the site.*
3. *The carpark to the east of the site [the current proposed location]*

Options were developed for each location on the site to test the scale, massing, access and impact on heritage assets, the conservation area, and the operational College, along with the ability to provide the required accommodation, parking, sports provision and a coherent campus on completion.

As a result of key challenges identified for sites 1 and 2, site 3 was selected as the proposed development area.

Key Challenges with development site 1

- *Negative impact on the listed Greenhead Park and wider conservation area due to 4-5 storey building close to the north boundary on the mid site plateau (one storey above the east carpark)*
- *Disruption to the delivery of education due to a long build programme over multiple phases that requires extensive temporary accommodation*
- *Requirement for extensive temporary works for service continuity and structural integrity*

Key Challenges with development site 2

- *Negative impact on the listed Greenhead Park and wider conservation area due to 3-4 storey building close to the north boundary on the upper site plateau (two storeys above east carpark)*
- *Unfeasible to reprovide pitch area on the site*
- *Location of building results in a disjointed campus which would have negative impacts on the delivery of education*

Development site 3

Whilst the selected site offered many advantages it was clearly recognised that the proposals had to be developed to respond suitably to the former Girls High School building (now referred to as Main Building by the College, which we shall adopt in the following text) and surrounding conservation area, being cognisant of the rich heritage within the local area.

Proposals for the selected development area have been refined to respond to the site and wider context. The building footprint has been optimised to deliver the required accommodation whilst maximising the separation distance from the Main Building, the Rostron building and ensuring that the important tree belt to the site perimeter can be retained.

A new pedestrian plaza is created at the south of the site allowing students and visitors to enter the site from Greenhead Road and access the new building and visitor entrance that will be retained in the Main Building. This new public realm removes the clutter of the existing carpark and sea of tarmac that currently faces visitors and will allow the main building to be appreciated in a safe and welcoming car free environment. The student entrance is carved out of the new building form to create a sheltered and clearly expressed point of arrival for all students.

A material palette has been selected that is respectful of the predominant tones and colours of the local stone and slate typically found on the historic buildings in the surrounding conservation area, and the rich variation and texture found within that stone; using a brick that pays homage to these tones and textures but does not seek to replicate them in a modern building so as to avoid a pastiche.

Utilising a simple and elegant pallet and avoiding unnecessary detail and ornamentation ensures that the new building will be subservient and complimentary to the former Girls High School building on the site.

The fenestration and elevational treatment have taken cues from the existing building and historic photos of the former Greenhead Hall that once stood on the site. The elevations are composed to reflect the strong vertical datums set by consistent window heads, eaves and parapets. Windows are stacked vertically and utilise a regular module and proportion in keeping with the existing building and applied as either a single, double, or treble unit as is the case on the Main Building.

The roofscape has been developed to deliver benefits to the local environment and to assist in delivering a project funding requirement for the building to be net zero carbon in operation. The building is being designed to be highly energy efficient and to offset the remaining carbon used to operate the building through on-site generation. As a result, the roof is proposed as a Bio-Solar roof, which is a combination of Photovoltaic panels which will generate electricity and a bio-diverse green roof which will provide a valuable habitat and positively contribute to the local environment.

A parapet is provided to ensure the roof can be safely maintained and the working elements of the roof are not visible from the ground. The parapet also reflects the approach that was adopted on many historic buildings in the town centre including the former Greenhead Hall, and is reflective of the view you experience on the likes of John William Street where the buildings terminate on a very clearly defined parapet line.

- 6.24 Ultimately, a balanced assessment will be required which weighs the visual impacts of the proposal upon the surrounding built and historic environment, against the benefits to local education. Both considerations sides of this

assessment require elaboration and further details being provided at application stage. Nonetheless, officers and the applicant are welcome any comments or questions on the details available at this time.

Landscaping and external works

- 6.25 The plans to form an outdoor social space is welcomed in principle as it would provide various benefits to the site and students. This is subject to a review of detailed design. The inclusion of soft landscaping would be welcomed, and a landscaping strategy should be submitted. 'Secure lines' are shown on plans: the need for access control is accepted, but appropriate harmonious design would be required.
- 6.26 LP33 relates to development proposals affecting trees. Any subsequent application would require an Arboricultural Survey, Arboricultural Impact Assessment and Method Statement, each to BS5837. It is appreciated that the proposal would require the loss of trees within the site's centre. The removal of the trees within the site's central areas is not opposed in principle, but their loss should be mitigated through appropriate re-planting within the site, to be detailed within a landscaping plan.
- 6.27 Conversely, the trees along the site's boundary are of substantial amenity value and they contribute to the character of the area. Furthermore, they directly attribute to the verdant nature of the Greenhead Conservation Area, which forms part of its heritage value. Their loss, or a proposal which may affect their long-term viability, is unlikely to be supported¹. The proposal also currently includes a new access from Park Avenue, which is tree lined. It is likely that a new access from this road would require the removal of one or more street trees. These trees carry the same value as the site's boundary trees, and their removal would be initially opposed unless suitably evidences. If their removal is suitably justified, the loss of these street trees may be mitigated through replacement street tree planting.

Impact on residential amenity

- 6.28 Due south of the proposed building are several properties on Greenhead Road facing the site. These would be, at their closest, circa 30m from the proposed 4 storey building. Several mature trees are located between the structures (along the college's boundary) and would somewhat screen. Being due north overshadowing would not occur. 30m is sufficient distance to prevent overlooking concerns. However, given the scale of the proposed building, officers hold concerns over potential overbearing impact. Further details, such as the submission of cross sections and more detailed block plans, are required to make an informed decision on this matter and are requested at application stage, with the applicant to be notified of this concern.

¹ Unless appropriate arboricultural reasons are given, and other options to save the tree are suitably evidenced as discounted.

- 6.29 The proposal includes the current MUGA being re-located and a new car park. When the current MUGA was granted planning permission it was conditioned to be for school use only and limitations on lighting. This was to preserve residential amenity, given the proximity to neighbouring properties, and highway safety, given the disconnect from the car park. The applicant has suggested they may consider an open use for the local community, if supported by the LPA. It is noted that the new MUGA would be smaller and moved away from residential properties compared to that previously approved. Nonetheless, the impact of a community use, as well as the environmental impacts of the new car park (light and noise pollution) would have to be justified and assessed at application stage.
- 6.30 The proposed building may include kitchen / dining facilities. As the building is close to residential properties which may have their amenity affected by various odours and noise from the extraction systems. Therefore, with any future planning application, it would require an odour extraction scheme. It should consider all the extraction systems to be installed in the new building that have the potential to cause noise and odour. It should also include details of the proposed methods of odour control and dispersion, and the noise mitigation measures that would be incorporated into the extract systems along with an ongoing maintenance schedule.

Highways

- 6.31 As a pre-application submission full supporting details are not held at this time. To enable Highways Development Management to make a proper and meaningful assessment any subsequent application should include a Transport Assessment. A stage 1 road safety audit covering all aspects of the design including the proposed access and internal layout should be submitted. Nonetheless, based on the information available, officers and Highways Development Management offer the following assessment.
- 6.32 The application is to provide a net gain in educational floor space. However, the applicant has stated that the proposal would not increase the number of students attending the college (remaining at 2505). The increased floorspace is to comply with modern teaching standards and to offer improved student social spaces. The current main car park would be built upon, with a new car park erected to the west replacing spaces at a ratio of 1:1, retaining the on-site parking figure at 159 spaces.
- 6.33 Notwithstanding the above, the applicant is expected to independently assess whether additional parking is required as part of the development, or to alternatively demonstrate why it is not as part of their submission through an appropriate Transport Assessment. Kirklees LPA does not have set parking standards, instead, requiring a site-by-site parking assessment on each proposal's merits. If the level of parking is determined to be acceptable, officers could consider conditioning a limit on student numbers to 2505, along with the provision of the parking spaces, on highway grounds (subject to review of the relevant tests for planning conditions when all information is available).

- 6.34 The proposed access from Greenhead Road into the new car park is shown to be widened and improved with a slight carriageway build-out into Greenhead Road to enable the required sight lines to be achieved. The application would have to demonstrate that the access to the new car park, via improvements to an existing closed entry point, complies with modern highway standards.
- 6.35 Regarding the site's existing access points, most of the accesses onto Greenhead Road and Park Drive South have restricted sightlines, as identified by Highway Safety and Ward Councillors. This is partly attributed to close on-street parking but also, the height of boundary walls. The Transport Assessment should demonstrate that these issues are not exacerbated by the proposal and should consider the options to improve the existing accesses.

Sustainable travel

- 6.36 LP21 of the Local Plan requires that applications demonstrate adequate information and mitigation measures to avoid a detrimental impact on highway safety and the local highway network. Proposals should also consider any impacts on the Strategic Road Network'. LP20 relates to sustainable travel. It states that:

Proposals for new development shall be designed to encourage sustainable modes of travel and demonstrate how links have been utilised to encourage connectivity. Proposals would be required to facilitate the needs of the following user hierarchy:

- a. pedestrians*
- b. cyclists*
- c. public transport*
- d. private vehicles*

- 6.37 An application's Transport Statement would form the basis of 'adequate information' and is expected to suggest mitigation measures, if identified as necessary, as well as methods to support the above-mentioned hierarchy. Furthermore, LP20 and the Kirklees Highways Design Guide SPD have an expectation for major developments to include Travel Plans, which should include methods for supporting the travel hierarchy and may also aid in addressing concerns raised by Highways Safety and Ward Councillors. A draft Travel Plan should be provided at application stage.

Waste

- 6.38 The proposed building would include a new dining facility and would include numerous classrooms. The applicant has been advised to consider how the new building would fit into the existing waste storage and collection arrangements for the school in any subsequent application, to demonstrate adequate arrangements may be implemented. Swept paths should be provided which demonstrate that an 11.85m refuse vehicle can enter and exit the site from the proposed service access and turn within the site.

Drainage and Flood Risk

- 6.39 The site is within Flood Zone 1. However, as the site has an area over 1 hectare a site-specific Flood Risk Assessment would be required to support an application. Neither a sequential test nor exemption test are required.
- 6.40 A drainage strategy would be required to support any subsequent application. Kirklees LPA and Lead Local Flood Authority (LLFA) promote the drainage hierarchy. However, as a brownfield development, the existing drainage system may be used, subject to a demonstrated 30% betterment to the current drainage rate.
- 6.41 The applicant has been advised that early consideration should be given to ensuring appropriate siting for attenuation features, including their future management and maintenance. Any subsequent application is likely to require a S106 agreement to secure the management and maintenance arrangements of the site's attenuation features unless a condition is agreed to be acceptable.

Other matters

Air Quality

- 6.42 In accordance with government guidance on air quality mitigation, outlined within the NPPG and Chapter 15 of the NPPF, and local policy contained within LP24 and LP51 and the West Yorkshire Low Emission Strategy Planning Guidance seeks to mitigate Air Quality harm.
- 6.43 Given the scale and nature of the development officers seek the provision of electric vehicle charging points, on new development that includes car parking. The purpose of this is to promote modes of transport with low impact on air quality. The provision of electric vehicle charging points should be considered within the submission.

Contamination

- 6.44 The site has no history of industry and no flagged issues relating to ground contamination. Furthermore, the end use is not considered sensitive by K.C. Environmental Health. Accordingly, based on the information before officers, ground investigation reports are not considered necessary to support the application. However, on any subsequent application which is approved, an 'unexpected contamination' condition would be imposed, outlining the steps needed should unexpected contamination be found during the development process. This is to ensure compliance with LP53 of the KLP.

Crime mitigation

- 6.45 The applicant is in discussions with the Council's Designing Out Crime Officer and the district's Counter Terrorism Security Advisor, to explore incorporating appropriate security measures into their proposal.

Ecology

- 6.46 The scale of the proposal has the potential to impact upon local ecology. Furthermore, applications are required by policy to secure net gains to ecological value. This is to comply with LP30 of the KLP and Chapter 15 of the NPPF.
- 6.47 K.C. Ecology have reviewed the proposal and provided the applicant with detailed advisory comments. In short, they do not have sufficient information to undertake an informed assessment currently. Any subsequent application should be supported by an Ecological Impact Assessment (EclA). The EclA should include an assessment of net gain, using the DEFRA Biodiversity Metric 2.0, with an initial target of 10% net gain on site to be delivered.

Pre-application Public Engagement

- 6.48 The applicant has been encouraged to carry out public consultation and engagement prior to submitting their planning application, in accordance with paragraph 40 of the NPPF. The scope of this engagement should be agreed with officers prior to being undertaken. The results of their pre-application consultation would need to be considered and included in a Statement of Community Involvement to be submitted with any forthcoming planning application.

7.0 CONCLUSION

- 7.1 This pre-application is brought to the strategic planning committee to inform members of a potential planning application for demolition and erection of new large education building at Greenhead College. This report sets it the identified key considerations for any future planning application.

8.0 RECOMMENDATION

- 8.1 That members note the contents of this report for information.