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**Report of the Head of Planning and Development**

**STRATEGIC PLANNING COMMITTEE**

**Date: 21-Oct-2021**

**Subject: Planning Application 2021/91508 Demolition of part of former college buildings and erection of police station, including conversion of Oldroyd Building and erection of new buildings comprising police custody suite, associated support services buildings, decked and surface car parking, vehicle access point, boundary treatments and landscaping Kirklees College, Halifax Road, Dewsbury, WF13 2AS**

**APPLICANT**

Lee Sidebottom, West  
Yorkshire Police

**DATE VALID**

12-Apr-2021

**TARGET DATE**

12-Jul-2021

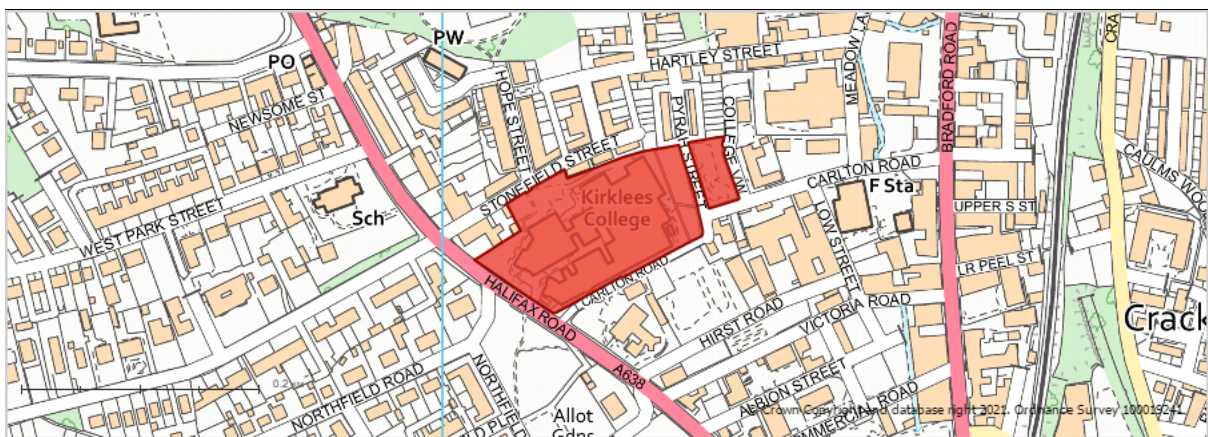
**EXTENSION EXPIRY DATE**

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Please click the following link for guidance notes on public speaking at planning committees, including how to pre-register your intention to speak.

<http://www.kirklees.gov.uk/beta/planning-applications/pdf/public-speaking-committee.pdf>

**LOCATION PLAN**



**Map not to scale – for identification purposes only**

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**Electoral wards affected: Dewsbury East**

**Ward Councillors consulted: Yes**

**Public or private: Public**

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**RECOMMENDATION:**

DELEGATE approval of the application and the issuing of the decision notice to the Head of Planning and Development in order to complete the list of conditions including those contained within this report.

**1.0 INTRODUCTION:**

- 1.1 In accordance with the Council's Scheme of Delegation, this application is brought to Committee on the grounds that it is a non-residential planning application where the site boundary exceeds 0.5 hectares.
- 1.2 This application is submitted on behalf of West Yorkshire Police (WY Police) for the demolition of part of the former Kirklees College buildings and the construction of a new District Headquarters. The proposal underpins the applicant's strategic estate strategy to enable them to deliver a response service across the area.

**2.0 SITE AND SURROUNDINGS:**

- 2.1 The proposed site, presently occupied by the former Kirklees College facility, extends to 1.7 hectares. It is bounded by Halifax Road to the west, Carlton Road to the south, Stonefield Street to the north and Pyrah Street to the east. It is in a prominent location on a main arterial route in and out of Dewsbury, approximately 0.5 miles north of Dewsbury Town Centre. Kirklees College previously accommodated 100 staff and 1,200 students on this site. It has since relocated to Dewsbury Town Centre.
- 2.2 In its entirety, the existing College buildings extend to 18,929m<sup>2</sup>. The majority of these were constructed in the 1960/70s but it also includes the Oldroyd Building, built in 1889 and used as the Dewsbury and District Technical School of Art and Science. An existing surface car park on Pyrah Street is also within the red line boundary.
- 2.3 Pedestrian access to the site is currently from Halifax Road and Carlton Road. Vehicular access is provided from Stonefield Street to a surface car park to the north of the existing buildings. There is a further restricted access route to Carlton Road.
- 2.4 Topographically, the site slopes steeply from west to east. In terms of landscaping, there are existing self-seeded trees and scrubland to the rear of the site at Pyrah Street. There are also several large trees in the corner of the site's frontage, adjacent to the bus stop on Halifax Road.

2.5 The surrounding area is mixed. To the north and east, it is principally residential, typically characterised by stone terraces along Stonefield Street and red brick terraces on Pyrah Street. There are further residential properties on Carlton Road. Opposite the site on Halifax Road is a small park, with further houses beyond. Non-residential uses include the Ilaahi Masjid Mosque on Hope Street, also accessed from Halifax Road via Stonefield Street and the Dewsbury Masonic Hall on the corner of Stonefield Street and Halifax Road.

2.6 The site is unallocated in the Kirklees Local Plan. The Oldroyd Building lies within the Northfields Conservation Area, which also adjoins its northern boundary. To the south of the site, on the opposite side of Carlton Road, is the Grade II Listed former Dewsbury Infirmary, an impressive stone building constructed in Gothic Revival style and now occupied for residential use.

### **3.0 PROPOSAL:**

3.1 This is a full planning application that seeks extensive site clearance and demolition across the former Kirklees College site, the retention, extension and conversion of the Oldroyd Building and the construction of facilities to provide a new Police Station that would constitute a District HQ. It would constitute a sui-generic use (i.e. it would fall outside any specific planning Use Class).

3.2 The Police Station would accommodate a range of functions. It would provide a public reception area, interview spaces, and a 30 cell custody suite as well as the refurbishment of the Oldroyd Building to provide office based and operational staff for WY Police. It would result in 15,429m<sup>2</sup> of floorspace of which 9,222m<sup>2</sup> would comprise office and ancillary space. This would be a reduction of 3499m<sup>2</sup> compared to the existing site. The scheme also includes the provision of a split decked multi-storey car park with 208 spaces and a total of 282 spaces across the site.

3.3 There are four main elements to the proposed development:

- The retention of the majority of the Oldroyd Building on the corner of Halifax Road and Carlton Road. This would be converted principally into office accommodation. To support the occupancy and uses within the Oldroyd Building, a new 5 storey core has been designed to adjoin the eastern gable aligned to the central corridor of the Oldroyd Building. Each floor would then have access to a new stair, lift, WCs, meeting rooms and breakout space for staff. It is proposed that the core would be constructed in brick with large areas of glazing. Along the southern elevation, the facade is designed to step back to respect to the Oldroyd Building. The connection is proposed in curtain walling to provide a bridge between the old and new structures.
- A custody suite within the central part of the site to accommodate 30 cells. This would be a double height building to be constructed in brick. The expansive brickwork elevations would be broken down with areas of recessed brickwork to provide detail and visual relief. A new glazed atrium is proposed between the northern façade of the Oldroyd Building and the southern façade of the custody building.

- A single storey ‘front of house’ building that would provide a public entrance and reception area to the Station, with access from Halifax Road. It would be set behind the existing bay of the Oldroyd Building to give the latter prominence. It would be a single storey extension, with pitched zinc screening to the roof to conceal external plant. It would connect to the atrium on Level 03. The public realm would provide new level access to the visitor reception.
- A multi-storey car park (MSCP) to the rear of the site. The MSCP would provide 208 spaces (200 car and 8 motorcycle) over three levels of which 55 would be designated for operational vehicle use and the remainder for staff use. This would be accessible from both Stonefield Street and Carlton Road. Further surface parking for 33 car would be provided in the existing surface car park on the eastern side of Pyrah Street and 11 spaces will be provided within the site on the western side of Pyrah Street. An additional 14 surface spaces would be provided via the Carlton Road access and 16 spaces located within the site accessed from Stonefield Street. This would provide a total of 282 spaces across the site. A small visitor parking area providing 3 spaces would be accessible directly from Halifax Road.
- Access would be from Carlton Road and Stonefield Street. The north eastern boundary wall of the car park would be of solid brick construction, to mitigate boundary fire spread and any noise and pollution impact to the adjacent properties. To reduce the visual impact of the wall, appropriate landscaping and trees are proposed to screen the development. Tall vegetation and trees are also shown to the embankment off Pyrah Street to provide a green edge to the site. Existing surface parking located off Pyrah Street would be retained to accommodate 33 vehicular spaces for staff use.

3.4 The development would result in approximately 614 full time equivalent employees with a maximum occupancy of 296 staff on a weekday. It would operate 24 hours a day with four shift patterns as well as non-shift workers.

3.5 Vehicular access into the site is proposed from both Stonefield Street and Carlton Road comprising the following:

- Two access points would be provided onto Stonefield Street. The western junction would allow for both entry and exit with an eastern junction providing an exit only. Both junctions would allow exit by a left turn only onto Stonefield Street and access would be by right turn only from Stonefield Street. This entrance would be primarily for deliveries, waste collection, some operational vehicles serving the custody suite and 16 staff vehicle bays. The application states that this access would accommodate less than 30% of the total vehicle movements across the site (185 movements over the 24 hour period with a maximum of 26 peak hour vehicle movements in the evening (17:00 to 18:00) and a 24 vehicle movements in the morning peak (08:00 to 09:00).
- An access onto Carlton Road would support the remainder (70%) of operational and staff vehicles equating to circa 431 daily vehicle movements.

- An additional small visitor parking area providing 3 spaces accessed directly from Halifax Road via a left in / left out junction arrangement.

3.6 It is anticipated that should planning permission be granted, the Police Station would open in 2024.

3.7 The applicant has advised that the Kirklees College site was selected after a lengthy four-year search that extended to 34 sites. These were variously located across the District and included existing vacant plots and buildings. Key considerations in the search included location, security, deliverability, affordability, accessibility and functionality. Ultimately, other sites were discounted for a variety of reasons. In some cases, offers were not accepted. In other circumstances, the sites/buildings were discounted due to the costs associated with refurbishment vs the long-term limitations of existing buildings. It was ultimately decided that a new District Headquarters represented the best value approach and the application site was deemed to be the most favourable to meet the applicant's (and District's) needs.

#### **4.0 RELEVANT PLANNING HISTORY:**

4.1 This application was the subject of a pre-application enquiry (2020/20364), which was presented to the Strategic Planning Committee on 31<sup>st</sup> March 2021. Members made a number of comments including the following:

- General support for the proposal albeit some concern expressed about its location out of the town centre;
- A recognition that materials would be important to respect the historic context;
- It was noted that a high standard of design would be key and the pre-application was considered to be promising, particularly with regard to the retention of the Oldroyd Building;
- It is not a town centre location but rather, sited up a reasonably steep hill, which raised a concern about public accessibility;
- Members advised that they would encourage development to a high environmental standard;
- It was noted that the development would open up the site, which would be a positive attribute of the development.

#### **5.0 HISTORY OF NEGOTIATIONS (including revisions to the scheme):**

5.1 There have been a number of amendments to the scheme and further information requested in the course of the application including the following:

- Introduction of a set-back to the MSCP at the upper level to protect the living conditions of adjoining occupiers on Stonefield Street;
- Submission of a sunlight and daylight report to assess the impact of the proposal on the living conditions of adjoining occupiers;
- Clarity in respect of the impact of the proposal on on-street car parking on Stonefield Street and a consideration of alternative options;
- Further assessment of the Stonefield Street/Halifax Road junction;
- Further review of highway proposals and visibility of the Stonefield Street junction;
- A parking survey of Stonefield Street and surrounding roads;
- A further review of parking provision for the occupant;
- Detailed discussions in respect of materials.

## **6.0 PLANNING POLICY:**

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. The statutory Development Plan for Kirklees is the Local Plan (adopted 27<sup>th</sup> February 2019) (KLP).

### Kirklees Local Plan (2019):

- 6.2 The following policies are most relevant to the consideration of this application:

Policy LP21 Highways and Access  
Policy LP24 Design  
Policy LP28 Drainage  
Policy LP30 Biodiversity and Geodiversity  
Policy LP32 Landscape  
Policy LP33 Trees  
Policy LP48 Community facilities and services

### Supplementary Planning Guidance / Documents / Guidance:

- 6.3 The most relevant SPG/SPD document and guidance are the following:

Highway Design Guide (November 2019)  
Biodiversity Net Gain Technical Advice Note (June 2021)

### National Planning Guidance:

- 6.4 The following sections of the National Planning Policy Framework (NPPF) (July 2021) are most relevant to the consideration of this application:

Chapter 8: Promoting healthy and safe communities  
Chapter 9: Promoting sustainable transport  
Chapter 12: Achieving well designed places  
Chapter 14: Meeting the challenge of climate change

### Climate change

- 6.5 On 12/11/2019 the Council adopted a target for achieving “net zero” carbon emissions by 2038, with an accompanying carbon budget set by the Tyndall Centre for Climate Change Research. National Planning Policy includes a requirement to promote carbon reduction and enhance resilience to climate change through the planning system, and these principles have been incorporated into the formulation of Local Plan policies. The Local Plan predates the declaration of a climate emergency and the net zero carbon target, however it includes a series of policies which are used to assess the suitability of planning applications in the context of climate change. When determining planning applications the council will use the relevant Local Plan policies and guidance documents to embed the climate change agenda.

## 7.0 PUBLIC/LOCAL RESPONSE:

- 7.1 The application was advertised by means of site notices and a press notice in Dewsbury Reporter Series (13<sup>th</sup> May 2021) as a major application. It was also advertised by means of direct neighbour notification letters.
- 7.2 A total of 19 representations were received in response to the initial consultation. Whilst a number supported the idea of the Police Station, they objected to the proposal overall. A further consultation of interested parties and those who had responded to the original application was undertaken on 3 August 2021 in response to the amended proposal and additional highway justification. A further 4 objections were received, bringing the total to 23. In addition, a petition has been received signed by 113 residents of Stonefield Street, Hope Street and surrounding streets (including Oxford Street, Lidgate Close, Hartley Street, Cemet Terrace, Halifax Road, Northfield Road, Lidgate Gardens and Moorlands Avenue. The petition strongly objects to the proposal due to the use of Stonefield Street and extra entrances. It states that this would dramatically impact on residents' daily lives causing major inconvenience and havoc with car parking, increased noise, increased air pollution and problematic traffic congestion. It insists that the plans are reconsidered and make better use of Carlton Road.
- 7.3 The following is a summary of the representations received. These can be viewed in full at:  
<https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/detail.aspx?id=2021%2f91508>

### Highways

- Substantive amount of traffic that will arise from the existing plans, this is due to there being inadequate entry and exit options creating obstacles in nearby streets, resulting in blockage and merging.
- The area is already congested due to the parents taking their kids to school in the morning and afternoon and also, kids going to mosque in the evening.
- Stonefield Street joining on to Halifax Road is a blind junction and if you go towards Hartley Street, it is narrow and congested with parking car.
- Creating the entrance onto Stonefield Street would cause severe traffic issues especially at certain times of the day. By also creating 2 gates, this would diminish the parking spaces available on the street.
- Parking areas currently designated on Stonefield Street will have to be removed to accommodate the new access. The surrounding areas that include Hope Street and Tolson Street has parking issues currently so the loss of parking on Stonefield Street will leave residents with no parking.
- Access onto Halifax Rd via Stonefield Street is precarious at the best of times. One of the major concerns relates to peak times; morning school run and school finishing – this junction is extremely busy with most of the traffic feeding onto Oxford Rd to access the two high schools. Coupled with cars leaving after dropping off learners to gain access onto Halifax Rd. This is repeated in the morning and after school finishes.

- A mosque is situated towards the bottom end of Hope Street. The mosque is used between 1700 – 1900 Mon to Fri and Sat morning between 0900 – 1100 for young children who attend classes. Parents are dropping and collecting their children from around 1645 to 17:05 and then collecting from 1850 onwards. These times are extremely busy with traffic backing on Stonefield Street often up to the Hope Street junction trying to access Halifax Road.
- The Mosque traffic - every weekday to the school at the bottom of Hope Street, upwards of 200 children and their parents attend yet in the research these car visits are not reflected in the projected traffic flow. The research also underestimates the impact of school traffic in respect of the two schools at Oxford road;
- The current plan would create major traffic bottlenecks as the applicant is ignoring what makes the road busy on an average day, which surely is not favourable to the proposed station;
- St Johns Lodge – This is often used on an evening and parking by patrons. They are predominantly blue badge holders who park on the double yellowed areas on Stonefield Street. This is always a health and safety concern when it clashes with the mosque traffic.
- Creating the extra entrances to service the police station on Stonefield Street has been poorly considered, with no real consultation with the local residents except for the a single online meeting. The current plans should be refused and a request for new plans with better use of Carlton Rd to serve emergency vehicles.
- Lot of cars having access to the car park bring noise, pollution, disturbance and unnecessary traffic;
- Extra parking on Stonefield Street could increase if the double yellow lines are removed from 3 Stonefield Street upwards heading towards Halifax Rd junction;
- The design of the entrance and the exit will mean the possible loss in the privilege of residential car spaces;
- Entrance should be on the main road, Carlton road or Pyrah Street, which are much better suited.
- The entry/exit points in Stonefield Street will lead to a very dangerous situation with many small children and parents using the route to come and go from the Mosque / Madrasah. At best the people and traffic flow will cause obstructions to the police Entry/Exit points and at worst it will cause accident and harm to pedestrians or motorists due to the nature of the narrow street/road and volume of people/traffic.
- Stonefield St and surrounding areas are currently 'permit holders only' zones and despite this residents struggle to find parking some days. Therefore, the proposal to remove the current access gate in favour of 2 access gates is concerning as residents will lose their designated parking spaces.



- During school / work times the Stonefield St / Halifax Rd junction is extremely busy due to 2 high schools being situated on Oxford Road. There is also a Mosque (Ilaahi Masjid) and St Johns Lodge located in the vicinity which would be directly impacted by an increase in traffic;
- Existing parking issues / access on narrow roads navigating around parked cars / queuing traffic to get onto Halifax Road or get onto Stonefield Street would be compounded with the introduction of even more vehicles to a quiet area;
- A comparison was made regarding college vehicles accessing the building via Stonefield Street on the consultation. However, College vehicles were small cars in small numbers for short duration's throughout the day, with increasingly reduced numbers after 4pm. Not transport trucks, not vans, not 24/7 and not such a large number of vehicles that require an unsightly multi storey car park to be built;
- The local mosque is accessed 5 times a day and weekends. There is an increase in traffic during these times and parents will park on Stonefield Street at drop off/ pick up times, as vehicles are parked on both sides in Hope Street making it very difficult for people to get in and out. Young children from surrounding areas will be crossing Stonefield Street again the increase in vehicles will make this very dangerous;
- Many accidents from Tolson Street to Stonefield St and Hope Street onto Stonefield Street, as the council has never put clear road markings and drivers pull out without waiting.
- There are no public car parks in our area and residents don't need more vehicles coming in and out of their neighbourhood. They already struggle for parking and value their green spaces and don't want any more car parks being built either.
- The reliability of the parking surveys were questioned with a suggestion that those surveying were not around for the entire period.
- The parking surveys may indicate parking available during the day. This is expected when people are at work. However, the issue is when householders return home from work.
- It is chaos at the Stonefield Street/Halifax Road junction when people attend the Masonic Hall due to parking on double-yellow lines. The surveys have not taken account of this.

### Living conditions

- Overlooking issues
- Noise pollution from sirens;
- Noise and disturbance from using Stonefield Street to residents – as this will be a 24/7 site considerable disturbance is likely, again this would be removed if Carlton Rd was to be used.

- The sunlight will be blocked due to the high rise buildings as well as leading to a loss of privacy from being overlooked.
- Creating multi-storey parking will block direct sunlight and limit privacy;
- The police station will bring an array of people to our residential area, who ordinarily would have no need to come to the area. No plans to ensure the safety and protection for residents and our property. How will the right to privacy and freedom of movement be guaranteed;
- Residents green spaces, open views and quiet neighbourhood. The increase in access 24/7 for the police station from Stonefield Street would bring an unacceptable level of noise and air pollution impacting the health and wellbeing of residents. It seems no consideration on the severity of the impact on residents' way of life has been made in this application.
- It will impact on the value of properties especially being located so close to a site open 24/7 (N.B. It has been established in case law that the impact of a proposal on the value of residential properties is not a material planning consideration).
- Concern about the safety of children who go to the mosque nearby;

#### Construction matters

- Noise pollution arising from construction activities
- Odour and debris associated with construction.
- Demolition will cause significant disturbance include an increased amount of vehicles and trucks.

#### Design

- The college building has open views onto the hill and these should be preserved if any new builds are introduced

#### Support

- A resident has written in to state that the scheme represents a fantastic investment for the Northfield Conservation area, using the beautiful Victorian Buildings for a long term project. It is a brilliant way of guaranteeing their future use. Having a Police Station in this area will help bring crime down and give the area a sense of security.
- Happy to have such a prestigious centre on the doorstep but object to certain specifics of the proposed plan

#### Ward Members

7.4 Ward Members were consulted on the proposal by email. No formal comments have been received at the time of writing the report.

7.5 The applicant also undertook their own public consultation prior to the submission of this planning application. The Statement of Community Involvement (SCI) submitted with the planning application confirmed that the public consultation began on 3rd March 2021 with a press release by the applicant. A letter and email drop was carried out on 3rd March 2021 to the local community, whereby a total of 250 residences and businesses in close proximity to the site were contacted. The letter included a brief overview of the proposals and details of how to access the public consultation documents on the virtual exhibition website. The SCI confirm that 848 people visited the virtual exhibition over 30 days, with 1.2k views of the page in total. A question and answer session was also held.

## 8.0 CONSULTATION RESPONSES:

### 8.1 Statutory:

**KC Highways:** In response to the original submission in May 2021, Highways Development Management (HDM) raised some concerns about the access into the site from Halifax Road and the re-positioning of the bus shelter and bus/taxi stop. HDM were also concerned that based upon the travel planning approach, which might not be achieved at the peak occupancy level, there would be just 14 spaces available to accommodate any shortfall in staff parking demand. It was requested that the traffic generation comparison assessment and parking assessment should be based on modal surveys of existing staff. An assessment of the likely visitor parking was also requested.

Further information was subsequently provided by the applicant in July 2021, including an operational assessment of the Stonefield Street/Halifax Road junction, an updated Transport Assessment and a Technical Note on the parking implications on Stonefield Street. In their second response, received on 11 August 2021, HDM, Highway Safety and Highway Design confirmed that the revised proposals along Halifax Road, including a carriageway build out at the Stonefield Street/Halifax Road junction and a proposed bus stop relocation would be acceptable. However, Highways continued to raise concerns about parking provision and requested a further parking assessment and a survey of residents parking on Stonefield Street. A further measurement of the Stonefield Street junction was also requested. Following receipt and consideration of this additional information, HDM confirm that they do not object to the proposal subject to conditions. Their response is detailed in the highways section below.

**Lead Local Flood Authority:** Do not object subject to conditions to secure detailed drainage design.

### 8.2 Non-statutory:

**KC Conservation and Design:** Conservation and Design have no concerns about the proposed development on heritage and design grounds, subject to identifying suitable alternative facing materials to replace the originally proposed buff coloured Weinerburger Marziele bricks and reconsideration of, or further justification for, the alterations to the Carlton Road boundary treatments. On balance the proposed development would preserve the setting of the Northfields Conservation Area, it would lead to a moderate enhancement in the vicinity of Halifax Road but slight harm in the vicinity of Carlton Road and Stonefield Street. It would also cause slight harm to the setting of the Former Dewsbury Infirmary when viewed from Carlton Road. However, this harm should be weighed against the public benefits of the proposed development.

**KC Trees:** There are no objections to the principle of the development. The proposal retains the valuable trees on the Halifax Road frontage and provides significant opportunities to improve the landscape and tree scape on the site. However, an Arboricultural method statement is required to show how the retained trees will be protected during the construction phase. This will be secured via a pre-commencement condition. More specific detail about landscaping proposals are also required, which can be secured by condition.

**KC Environmental Health (KCEH):** KCEH agree with the approach and methodology of the air quality assessment subject to a condition that includes a requirement for a fully costed mitigation plan detailing the proposed low emission mitigation measures. A condition requiring electric vehicle charging points would also be necessary. With regard to contaminated land, a Phase II report is required, which can be secured by condition. With regard to noise, the findings of the Noise Assessment are accepted subject to conditions for the implementation of the agreed noise mitigation measures.

**KC Ecology:** In the initial consultation, further bat surveys were requested in the optimal period (up to the end of August), which were subsequently undertaken. Guidance was provided with regard to the proposed location of the bat and bird boxes, which were originally proposed on newly planted trees that may not be able to support these kinds of faunal boxes until they reach a later stage of maturity. A Bio-diversity Net Gain calculation was also sought in order to demonstrate that BNG could be achieved, which was subsequently provided. In response, the Council's Ecologist has confirmed that the submitted information is now broadly acceptable. It would be necessary for the management plan to include a work schedule for 30 years and to identify the management company responsible but this can be appropriately conditioned.

**Yorkshire Water:** No objection subject to conditions.

**West Yorkshire Crime Prevention Officer:** Undertaken direct liaison with the applicant.

## **9.0 MAIN ISSUES**

- Principle of development;
- Highways;
- Design, Landscape and Heritage (including demolition);
- Impact on the living conditions of the adjoining occupiers;
- Air Quality;
- Flood risk issues;
- Ground conditions;
- Bio-diversity;
- Climate Change;
- Other Matters;
- Response to representations.

## **10.0 APPRAISAL**

### **Principle of development**

- 10.1 This application is submitted by West Yorkshire Police (WY Police) and seeks full planning permission for the construction of a new Police Station. This would represent a sui-generic use (i.e. outside of any use class).
- 10.2 Within the KLP Allocations and Designations document (February 2019), the site is unallocated. As such, it is not designated for any specific use and this application is therefore considered on its individual merits.
- 10.3 The re-development of the College for this purpose would, however, result in the re-use of a vacant Brownfield site. As such, there is no objection in principle to the proposal in land-use terms, subject to a full and detailed assessment against all other relevant policies in the Kirklees Local Plan. This is set out in the report below.

### **Highways**

- 10.4 Policy LP21 of the Kirklees Local Plan advises that proposals shall demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users. It states that new development will normally be permitted where safe and suitable access to the site can be achieved for all people and where the residual cumulative impacts of development are not severe.
- 10.5 This reflects guidance within the National Planning Policy Framework (the Framework), which states at Paragraph 108 that in assessing application for development, it should be ensured that there are appropriate opportunities to promote sustainable transport modes, safe and suitable access to the site can be achieved for all users and any significant impacts from the development on the transport network can be viably and appropriately mitigated. Paragraph 109 confirms that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

### **Means of access into the site**

- 10.6 From Stonefield Street, there would be two vehicular access points. The western junction would allow for both entry and exit with an eastern junction providing an exit only. Having two points of access would be necessary to ensure the security of the Police Station. Any unauthorised vehicle arriving at the station would need to be turned away safely, for the safety of both members of the police and the public. At the primary entrance/exit, the barriers would be inset from Stonefield Street to prevent reversing onto the highway. Furthermore, in the event that an authorised vehicle(s) was behind an unauthorised vehicle(s), two access points would give the latter an alternative exit route prior to the secondary secure boundary, which would be at the entrance of the decked car park. For security reasons, the applicant has advised that they would not be able to allow unauthorised/un-vetted vehicles unfettered access through the site to exit from Carlton Road. The provision of two access points would require a modification to the existing parking bays on Stonefield Street (via an amendment to the existing TRO), which is considered in detail in the report below.

- 10.7 The waste store and delivery drop off facility would also be located off Stonefield Street so that deliveries and waste vehicles could enter the first secure zone only and these vehicles could then turn left, leaving the site through the "exit only" barrier. The decked car park would have restrictions in terms of height, weight and fire safety that would not allow these larger vehicles access. This is a key reason why the waste store is located between the entrance and exit and exit only on Stonefield Street. As set out in the report above, the Stonefield Street accesses would accommodate no more than 30% of the total vehicle movements across the site.
- 10.8 The access onto Carlton Road would support the remaining (70%) of vehicle movements into the site, comprising both operational and staff vehicles. It is proposed that the current operation of Carlton Road would change from two-way at its junction with Halifax Road to one-way westwards and two-way eastwards. This would require an amendment to the existing traffic regulation orders controlling the operation of Carlton Road.
- 10.9 Car parking for the proposal would principally be provided in the form of a decked car park, which would be located on the eastern part of the site. It would provide 208 spaces over three levels of which 55 would be designated for operational vehicle use and the remainder for staff use. This would be accessible from both Stonefield Street and Carlton Road. Further surface parking for 33 cars would be provided at Pyrah Street. An additional 14 surface spaces would be provided via the Carlton Road access and 16 spaces located within the site accessed from Stonefield Street. This would provide a total of 282 spaces across the site. A small visitor parking area providing 3 spaces would be accessible directly from Halifax Road. This would require the relocation of the existing bus stop.

#### Traffic Generation

- 10.10 In understanding traffic generation, the Transport Assessment clarifies that the site would generally operate on the basis of the following shift patterns:
- Morning – arrive at 06:30 and leave 16:00
  - Non- shift workers arrive at 08:00 and leave between 17:00 and 18:00
  - Day shift – arrive at 07:30 and leave at 16:00
  - Afternoon 1- arrive at 12:30 and leave at 23:00
  - Afternoon 2 – arrive at 15:30 and leave at 00:00
  - Evening – arrive at 17:30 and leave at 03:00
  - Night shift – arrive at 21:30 and leave at 07:00
- 10.11 Due to the nature of the operation at the Police Station and the intended shifts, the travel patterns would be complex. The following table sets out the maximum predicted daily breakdown of staff movements, operational movements and deliveries as provided by the Police. This assumes single car occupancy and makes no allowance for travel by alternative modes. It would therefore represent the 'worst-case scenario':

Time	Details	Staff in	Staff out
06:30	NPT (Neighbourhood Policing Team) Patrol, Custody and day shift staff begin arriving for the morning shift	107	0
07:00	Night shift Patrol and Custody staff start to leave sit	0	17
07:30	Staff from CID and Safeguarding departments begin arriving for the day shift	116	0
08:00-12:00	Non shift workers with various start times begin arriving on site	36	0
12:30	Safeguarding staff begin arriving at site for their afternoon shift	32	0
13:00	No movement of note	0	0
13:30	Additional Partners begin arriving on site	5	0
14:00	Maximum Occupancy reached	0	0
14:30	NPT (Neighbourhood Policing Team) staff begin arriving for the afternoon shift	11	0
15:00	Non shift workers with various finish times begin leaving the site	0	25
15:30	Patrol, Custody, CID and other Safeguarding staff begin to arrive on site for the afternoon shift.	31	0
16:00	Morning shift staff from Patrol, NPT, Custody, CID and Safeguarding departments begin to leave the site	0	127
17:00	Non shift workers continue leaving the site	0	81
17:30	Patrol staff start arriving on site for their evening shift	4	0
18:00	Non shift workers continue leaving site	0	6
19:00-20:00	No change	0	0
21:00	Part of the afternoons Safeguarding team begin to leave the sit	0	12
21:30	Patrol and custody staff start arriving on site for the night shift	29	0
22:00	Partners begin to leave the site	0	5
23:00	Safeguarding staff from afternoon shift begin to leave the site	0	12
00:00	NPT, Custody and remainder of Safeguarding staff from afternoon shift begin to leave the site	0	82
01:00-02:00	No Change	0	0
03:00	Patrol staff from on evening shift begin leaving the site	0	4
04:00-06:00	No Change	0	0
<b>Total</b>		<b>371</b>	<b>371</b>

**Table 1: Predicted daily staff movements (no allowance for sustainable travel)**

10.12 In addition, there would be operational vehicle movements across the site. Table 2 below sets out the predicted daily operational movements per gate entrance.

Trip Description	Stonefield St Entrance	Carlton Road Entrance
Marked Patrol Vehicles	0	38
Marked NPT Vehicles	0	19
Plain Vehicles	0	52
Arrested journeys	24	0
Other visits	4	4
Vans	6	0
Detainee Transfer	2	0
Other	0	2
<b>Total</b>	<b>36</b>	<b>115</b>

**Table 2: Daily operational movements per gate entrance**

10.13 The Transport Assessment also sets out the likely split of staff between the different access and parking locations. To account for the sustainable shift in staff travel (considered further below), a figure of 55% has been used in these traffic generation figures. 55% is considered to represent the upper limit of staff that would be allowed to park on site. For completeness, the staff figures with no adjustment for sustainable travel are also provided below for information.

Trip	Stonefield St	Carlton Rd	Pyrah St	Total
Staff (base on 55% on-site parking)	55	114	35	204
Staff (no adjustment)	100	207	64	371

**Table 3: Split of staff between access points**

10.14 The Stonefield Street entrances would be primarily for various deliveries, waste collection, some operational vehicles and 16 staff vehicle bays, totalling less than 30% of the total vehicle movements across the site. This would equate to no more than 185 movements over the 24 hour period with a maximum of 26 evening peak hour vehicle movements (17:00 to 18:00) and a smaller 24 morning peak hour vehicle movements (08:00 to 09:00). The remainder would be from Carlton Road. As above, this would represent the worst-case scenario.



10.15 Turning to traffic generation figures that take into account the intended sustainable shift in staff travel, a figure of 55% has been used in the traffic generation figures (taking into account sustainable travel) set out in Table 4 below:

Time	Arrivals	Departures	Two-way
00:00-01:00	2	47	49
01:00-02:00	2	2	4
02:00-03:00	2	2	4
03:00-04:00	2	4	6
04:00-05:00	1	1	2
05:00-06:00	1	1	2
06:00-07:00	60	1	61
07:00-08:00	67	11	<b>78</b>
08:00-09:00	26	7	33
09:00-10:00	3	3	6
10:00-11:00	7	7	14
11:00-12:00	6	6	12
12:00-13:00	23	5	28
13:00-14:00	8	5	13
14:00-15:00	12	6	18
15:00-16:00	23	20	43
16:00-17:00	9	79	<b>88</b>
17:00-18:00	9	52	61
18:00-19:00	7	10	17
19:00-20:00	6	6	12
20:00-21:00	4	4	8
21:00-22:00	20	11	31
22:00-23:00	6	9	15
23:00-24:00	3	10	13
<b>TOTAL</b>	<b>308</b>	<b>308</b>	<b>616</b>

**Table 4: Overall traffic generation figures**

10.16 These results indicate that the peak period for the Police Station would be between 07:00 and 08:00 in the morning and between 16:00 and 17:00 in the evening. This presents a different peak period to the previous College and would also be outside the background peak of Halifax Road and the surrounding area. A more traditional peak time period of between 08:00 and 09:00 and 17:00 to 18:00 would be expected for Halifax Road.

10.17 The Transport Assessment also includes a comparison to the change in potential traffic generated between the proposed development and the previous College operation:

<b>Time</b>	<b>Arrivals</b>	<b>Departures</b>	<b>Two-way</b>
00:00-01:00	+2	+47	+49
01:00-02:00	+2	+2	+4
02:00-03:00	+2	+2	+4
03:00-04:00	+2	+4	+6
04:00-05:00	+1	+1	+2
05:00-06:00	+1	+1	+2
06:00-07:00	+60	+1	+61
07:00-08:00	+40	-4	+36
08:00-09:00	-64	-9	-72
09:00-10:00	-44	-18	-62
10:00-11:00	-6	-3	-10
11:00-12:00	-10	-16	-26
12:00-13:00	0	-16	-16
13:00-14:00	-8	-12	-20
14:00-15:00	-13	-24	-37
15:00-16:00	0	-4	-3
16:00-17:00	-15	+21	+5
17:00-18:00	-34	+4	-30
18:00-19:00	-8	-16	-23
19:00-20:00	+2	-7	-5
20:00-21:00	+4	-26	-22
21:00-22:00	+19	-6	+12
22:00-23:00	+6	+9	+15
23:00-24:00	+3	+10	+13
<b>TOTAL</b>	<b>-59</b>	<b>-59</b>	<b>-117</b>

**Table 5: Trip Generation Net Change**

This table shows that whilst the Police Station would clearly generate different travel patterns to the previous College site in terms of hours of use, the development would also result in an overall decrease of 72 two-way vehicle trips in the morning peak (08:00-09:00), a decrease of 30 vehicles in the evening peak (17:00-18:00) and, overall, a daily two-way decrease of up to 117 vehicle trips across the day.

Junction Assessments

10.18 The TA concludes that the impact of development-related traffic would represent a net decrease in traffic during the likely AM and PM periods and throughout the day compared to the previous college use. As such, it was not considered necessary to undertake operational junction analysis of the development proposals. However, the Council's HDM Team, nonetheless, requested an operational analysis of the Stonefield Street/Halifax Road junction to take into account the use of Stonefield Street by residents and the effect of existing visitors to the Mosque (Ilaahi Masjid) on Hope Street. This was subsequently provided by the applicant.

- 10.19 The analysis included a traffic survey undertaken on Thursday 17th June 2021 between the hours of 07:00 -10:00, 13:00–14:00 and 15:00–19:00. Weekday AM and PM periods are generally selected for consideration as background traffic. The analysis incorporated a growth factor to the expected opening date of 2024, as well as a future assessment design year of 2029. In each scenario, the assessment concluded that the junction would operate within capacity as a result of this development.
- 10.20 The operational assessment results demonstrate that with the addition of the development traffic in the opening year, the Stonefield Street/Halifax Road junction would operate within capacity. The primary impact would appear to be on the Oxford Road junction opposite. It would result in a maximum RFC value of 0.74 on Oxford Road in the AM peak; the RFC is the Ratio of Flow to capacity and provides a basis for assessing capacity. A corresponding queue of 2.6 PCUs was noted on the Oxford Road approach; a PCU is a vehicle unit used to assess highway capacity, with one car being a single unit. It is expected that this might increase to 3.4 PCUs by 2029, with a maximum RFC of 0.80. However, the applicant determines that the junction would still be within capacity. The applicant was subsequently asked to provide further modelling information in this regard, which does also indicate that there could be a delay on Oxford Road of over 80 seconds with a short queue. Nevertheless, whilst acknowledging the delay to Oxford Road, it is considered that it would not constitute a severe delay as per the test within the NPPF. Moreover, there is no reasonable mitigation. Traffic signals would not be appropriate in this location because the delays would be to the side junctions. As the delay to Oxford Road would not be considered severe, keeping traffic moving on the main road (Halifax Road) remains the priority.
- 10.21 The TA also includes a review of collision data in and around the site for a 5-year period up to December 2020. A total of 5 collisions were recorded in this 5-year period. Of these, 4 were recorded as slight and 1 as serious with no fatalities. One collision involved a pedestrian and the remaining were vehicles. One location on Halifax Road within the frontage of the site was identified as a position where two collisions occurred (close to the frontage of the Oldroyd Building). However, the data identifies that they occurred two years apart. On this basis, it is not considered that the collisions can be linked or present a common contributory factor. The TA therefore concludes that the surrounding network is appropriate and safe for all road users, whilst still being able to fulfil its role as a key traffic distributor within the local area. This is accepted by HDM.

#### *Management of parking for staff*

- 10.22 WY Police support a sustainable approach to the development, which encourages alternative and sustainable modes of transport to manage peak period travel. WY Police advise that they have experience of operating a permit system at their Headquarters in Wakefield. This ensures that those with a permit are able to park on site without delay. Those staff without a permit therefore know in advance that they would have to make alternative provision and can plan an alternative mode of transport or parking arrangements. Any permit system would be tailored to address peak times whilst maximising the facility out of normal office hours i.e. 17:00 – 07:00, and at weekends. Confirmation of the permit system would be secured by condition through a parking management plan.

10.23 In the course of the planning application, WY Police have also reviewed how staff will work moving forward. The TA originally identified that staff travel would be split 55% of staff parking on site under the controls of the proposed permit parking system above and 45% travelling by alternative and sustainable modes. Of this 45%, 10% would be home working, 15% would use sustainable travel and 20% would be likely to use private car travel and parking elsewhere. However, Officers raised concerns about this 20% of staff that would park elsewhere.

10.24 Subsequently, WY Police, in line with many employers during the Covid pandemic, have undertaken a review of homeworking practices. WY Police initiated 'Agile/Homeworking' to the Force in 2018/19, which was predominately aimed at management and non-uniformed officers and staff. However, the onset of the pandemic has changed and accelerated the requirement for homeworking. It is now anticipated that 26% of staff would be predominantly homeworking, which is significantly higher than the 10% originally promoted. In practical terms, staff with homeworking capability may not work from home 100% of the time but rather, going into the office 1 day per week. Accordingly, it is considered that 4 days of the week represents the typical agile working week arrangement.

10.25 Nevertheless, the increased level of staff homeworking would consequently decrease the number of staff travelling to work either by sustainable modes or by private car and parking elsewhere. Considering the overall 45% split of staff as detailed previously and taking account of the 26% staff who would now be homeworking, this results in the remainder of staff (19%) either travelling by sustainable modes or private car and parking elsewhere. In terms of actual staff numbers, this is summarised below:

<b>Mode of Travel</b>	<b>Originally proposed split</b>	<b>Split now proposed</b>	<b>Staff numbers based on split now proposed</b>
Home working	10%	26%	96
Sustainable Travel	15%	8%	30
Travel by private car and parking off-site	20%	11%	41
Staff parking on-site	55%	55%	204
<b>TOTAL</b>	<b>100%</b>	<b>100%</b>	<b>371</b>

**Table 5: Travel Split**

10.26 It is relevant to note that the results presented in Table 5 indicate that 41 staff could potentially drive and park elsewhere. However, no allowance has been made for staff who may car share and therefore, the assessment represents a worst-case scenario.

10.27 Furthermore, the applicant has undertaken a detailed survey of public car parking areas (including on-street parking) within 800m of the site (approximately a 10 minute walk). The survey excluded permit parking bays, restricted parking areas (double yellow lines), Lidl and the railway station east car park. It identified a total of 993 spaces. The survey was undertaken on three separate days – Monday 23<sup>rd</sup> August between 1pm and 3pm, Monday 6<sup>th</sup>

September between 1pm and 3pm and Friday 10<sup>th</sup> September between 8am and 10am. Car parking provision of less than 2 hours was excluded as it would not support staff needs. However, the survey identified at least the following availability in nearby car parks:

Car Park Location	Number of spaces	Available spaces from 1pm on Monday 23 <sup>rd</sup> August	Available spaces from 1pm on Monday 6 <sup>th</sup> September	Available spaces from 8am on Friday 10 <sup>th</sup> September
Wellington Road Car Park	56	31	44	54
Train Station Car Park (west)	210	65	70	185
Commercial Road Car Park	39	31	12	35
Cliffe Street Car Park	415	234 (capacity reduced for Covid testing)	394	255 (capacity reduced for Covid testing)

**Table 6: Car park capacity locally.**

10.28 The survey did also consider on-street car parking within the vicinity on roads such as West Park Street, Birkdale Road, Lidgate Lane, Mill Road and Victoria Road and found extensive capacity. HDM have considered the survey and note that even within the car park and streets that lie within 400m of the site, including Hirst Road, Victoria Road, Albion Street, Mill Road, Birkdale Road and the Commercial Street car park, there was on average 98 spaces available, which would be more than sufficient to accommodate staff that may choose to drive within the parameters set out above.

#### *Sustainable Travel*

10.29 In addition, it is advised that a Travel Plan would form a key part of the implementation strategy going forward to encourage staff to travel by means other than the private car and further reduce those staff driving to the site. The Framework Travel Plan submitted with the application identifies a package of measures to promote greener, cleaner travel choices and reduce the reliance on the car. It identifies four key objectives:

- Promoting walking, cycling and public transport as the primary modes of travel;
- To deliver mode shift from car journeys to alternative modes including multi-occupancy vehicle trips;
- To reduce vehicle emissions through the take up of alternative transport modes and;
- To deliver education and promotion of walking and cycling as options for a healthier lifestyle.

10.30 Overarching targets would be set once baseline travel surveys have been carried out following first occupation of the premises. It is therefore recommended that a further Travel Plan be secured by condition. To be effective, this would be expected to include the following:

- The appointment and funding of a Travel Plan Coordinator to be responsible for the management and maintenance of the travel plan;
- The overall outcomes to be achieved by the travel plan; the performance indicators and targets;
- Details of the travel planning requirements for future occupiers; the process for the monitoring and review of targets and measures;
- The measures to be implemented, such as the provision of parking controls and management and contributions towards other measures such as car and cycle clubs;
- A monitoring and review programme, detailing the survey methods to be used and who is responsible for funding the surveys, undertaking and reporting results;
- Any sanctions where the targets and indicators are not being met, and how and when they should be applied (such as more active or different marketing of sustainable transport modes or additional traffic management measures).

10.31 In terms of accessibility to other modes of transport, Dewsbury Railway Station is located approximately 720m walking distance from the site. This is within the maximum walking distance of 800m recommended within the Chartered Institution of Highways and Transport ('CIHT') published the guidance document 'Planning for Walking' (2015). Dewsbury provides services to both Leeds and Manchester.

10.32 The site would also be accessible by bus with a bus stop in front of it and within 100m on the other side of the road. These are also within the recommended walking distance in the CIHT document above. This bus stop provides a regular connection between Dewsbury and Bradford with a 15 minute frequency during the day and 30 minutes in the evening (Monday-Friday) with a 30 minute frequency service during the day on Saturdays and Sundays and hourly during weekend evenings. These routes would also provide a connection to Dewsbury Bus Station, which would offer a wider range of services.

10.33 In terms of cycle provision, the proposal would include cycle parking in line with Kirklees Council standards. This sets out a requirement of 1 space per 300m<sup>2</sup>, meaning that a total of 30 staff cycle spaces would be provided. Additional visitor cycle parking in the form of 10 covered spaces would be located within the visitor car park accessed via Halifax Road. The site is therefore appropriately accessible by means other than the private car.

*Impact on on-street car parking within the vicinity of the site*

10.34 One of the key issues in the assessment of the highway impact of the proposal has been the effect on Stonefield Street and immediately adjoining streets, both in terms of traffic generation (considered above) and the impact on on-street parking provision. This has been a particular concern for local residents, as reflected in the public representations to the application. It is a matter that has been discussed at length with the applicant and it resulted in the submission of a specific Residents Permit Parking Technical Note.

10.35 The Technical Note recognises that on-street resident permit parking is a feature of Stonefield Street and the adjoining roads surrounding the site. It operates between 8am and 8pm Monday to Friday. To facilitate the new access points (including their width), a total length of 44m of permit parking would need to be removed from Stonefield Street.

10.36 In the first instance, the applicant was been asked to provide further evidence that alternative solutions have been considered that would not result in a loss of parking bay spaces on Stonefield Street. This has included a consideration as to whether the number/width of access points onto Stonefield Street could be reduced or existing bays on Stonefield Street could be extended to eliminate unauthorised parking with a potential subsequent effect on highway safety. In response, the applicant has confirmed as follows:

- As set out at Paragraph 10.6, having 2 points of access onto Stonefield Street would be necessary to ensure the security of the Police Station. The waste store and delivery drop off facility would also be located off Stonefield Street. This would enable deliveries and waste vehicles to enter the first secure zone only. These vehicles drop off goods and pick up waste including skips (drivers of these vehicles are unvetted) and these vehicles can then turn left leaving the site through the "exit only" barrier. The decked car park has restrictions in terms of height, weight and fire safety that would not allow these larger vehicles access. This is a key reason why the waste store is located between the entrance and exit and exit only on Stonefield Street;
- Substantial vehicle turning modelling work has been undertaken to test and determine the access design. A turning head within the boundary of the site could not be accommodated for the size and functionality of vehicles required to enter/exit at this location;
- The applicant would also be unable to create an off-set on Stonefield Street to effectively allow a recessed bay into the site to retain on-street parking. The effect of the offset would reduce the internal area to a point where the internal road could not be accommodated. A similar modelling exercise was undertaken on Carlton Road to determine whether this route could be a suitable alternative for service vehicles. However, due to the gradient of the highway and the necessary access ramp, such vehicles cannot access the site from this location;
- In terms of extending the existing parking bays on Stonefield Street, the applicant has tracked vehicles in and out of the proposed entrances on Stonefield St and this has identified the areas where they can locate spaces (on the north side of Stonefield Street opposite and between the entrances). The applicant cannot locate spaces between the junction with Halifax Road and the new entrances due to safety/visibility issues. For the same reason, on-street spaces cannot be located between the entrance and exit points on Stonefield Street. This limits the opportunity to provide replacement spaces.

10.37 Based upon the specific site constraints identified by WY Police for them to operate the site safely and effectively, it is therefore accepted that to facilitate the new access points, the 44m of permit parking would need to be removed from Stonefield Street. This is equivalent to approximately 7 vehicle spaces (based upon a 6 metre length per space, which is the general length

requirement of parallel parking bays. However, a length of 23m would be replaced on Stonefield Street (equivalent to 3-4 spaces). So that is a loss of 3-4 spaces on Stonefield Street as a whole. An additional 24m (approximately 4 spaces) would be provided on Pyrah Street. There would therefore be a net increase of at least 1 parking space within the vicinity of the site, albeit in a modified location(s).

10.38 Furthermore, following concerns raised by Officers regarding the loss of these spaces, the applicant was requested to undertake a parking survey of Stonefield Street to understand the current use of resident parking permits and the availability of spaces within the area. The surveys were undertaken on the 7<sup>th</sup> (Tuesday) and 10<sup>th</sup> (Friday) of September 2021 during the hours of 07:00 and 19:30 and included the following streets:

- Stonefield Street
- Hope Street
- Tolson Street
- Hartley Street
- Pyrah Street

Taken together, and whilst spaces are not individually numbered or marked, the number of spaces counted within the parking survey was 118 spaces. The parking survey identified the number of bays that had a vehicle parked either with or without a permit every 30 minutes across the survey period.

10.39 The results of the survey are broadly summarised below:

Street	Available Parking Bay Spaces		Maximum Occupancy
	Tuesday 7 <sup>th</sup> September	Friday 10 <sup>th</sup> September	
Stonefield Street	5 all day	3 all day	69% - Tuesday 0700
Hope Street	0 all day 5 bays between 0700 and 1300	0 all day Four of the five bays were free during the hours of 07:00 to 12:30	82% - Friday at 13:30 hours.
Tolson Street	2 all day The majority of bays full between 07:00 and 10:00 and 16:30 19:30. During the period 08:00 to 17:30 three bays were available	4 parking bays available all day. The majority of bays were full between 07:00 and 10:00 with bays available for periods in the afternoon.	56% - Tuesday and Friday between 0700 and 0800
Hartley Street	9 all day	3 all day	58% - Friday between 1900 and 1930
Pyrah Street	6 all day	3 all day	57% - Tuesday and Friday between 07:00 and 08:00.

**Table 7: Summary of parking survey results.**



- 10.40 Overall, the survey revealed that on the Tuesday, altogether on the surrounding streets, there was an average of 23 parking bay spaces available with 13 spaces available during the Friday survey. On Stonefield Street specifically, the proposal would displace approximately 3-4 parking bays from Stonefield Street resulting in a total provision of approximately 26 bays. The results of the parking survey indicate that on average, a total of 25 parking bays in Stonefield Street were in use all day.
- 10.41 This would suggest that the alterations to the parking arrangements could accommodate the current demand for parking on Stonefield Street even without the additional provision of spaces on Pyrah Street. HDM have considered the parking survey and it is agreed that it demonstrates that the revised parking proposals can accommodate the parking demands along Stonefield Street with further parking available across the streets surveyed.
- 10.42 Furthermore, a parking permit does not guarantee a resident that a parking space will always be available outside their property. Unfortunately, there is no right to on-street parking adjacent to a residents' house. Therefore, having regard to the NPPF, this proposal is not considered to constitute either an unacceptable impact on highway safety nor would the residual cumulative impacts on the road network be severe. As such, these matters could not be substantiated as a reason for refusing this application.

#### *Highway Summary*

- 10.43 Taking all these matters into account, it is concluded that the proposal can be accessed effectively and safely by all users. Subject to conditions to secure access details, the appropriate provision of cycle facilities and a comprehensive Travel Plan, the development would also provide appropriate opportunities to promote sustainable transport. It can deliver a safe and suitable access and the traffic generated by it can be appropriately accommodated on the transport network. It is therefore in accordance with KLP Policy LP21 and guidance within the Framework.

#### Design and Heritage Impact (including demolition)

- 10.44 Policy LP24 of the KLP advises that proposals should promote good design by ensuring, amongst other matters that the form, scale, layout and details of all development respects and enhances the character of the townscape, heritage assets and landscape. With regard to landscape, Policy LP32 advises that proposals should be designed to take into account and seek to enhance the landscape character of the area whilst Policy LP33 advises, amongst other matters, that proposals should normally retain any valuable or important trees where they make a contribution to public amenity, the distinctiveness of a specific location or contribute to the environment. Where tree loss is deemed to be acceptable, developers will be required to submit a detailed mitigation scheme. Finally, Policy LP35 of the KLP relates more specifically to the historic environment where development proposals affect a designated heritage asset.
- 10.45 In this case, part of the application site (The Oldroyd Building) lies within a designated Conservation Area (CA) - Northfields. It also lies within the setting of a Grade II Listed Building at the former Dewsbury Infirmary, now known as Boothroyds. In accordance with the statutory duties set out in Section 66(1) and Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990

respectively, the Council has a duty to consider the impact of a proposal on the special architectural and historic interest of any listed buildings affected, and their settings and to the desirability of preserving or enhancing the character or appearance of the Conservation Area.

- 10.46 Furthermore, the NPPF confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Paragraph 202 of the Framework states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 10.47 In considering the character of the CA, Northfields is a late nineteenth century residential suburb of Dewsbury. It has many fine Victorian villas and terrace houses grouped along tree lined streets. It also contains a number of prominent public and former public buildings including St Marks Church, the former Dewsbury Infirmary, the former Wheelwright Grammar School and the former Dewsbury and District Technical School (Kirklees College), the latter being the subject of this application. The Oldroyd Building within the application site is the only part of the College campus within the CA. The building presents a relatively restrained neo-Gothic style. It is understood that it suffered significant fire in the 1980's leading to major refurbishment work, which was completed in 1990. This included construction of a new steel framed roof with the provision of accommodation in the roof space.
- 10.48 The proposed re-development of the site would result in the demolition of the buildings outside of the CA and early 20<sup>th</sup> Century additions to the rear of the Oldroyd Building. Their demolition constitutes development such that it forms part of the consideration of this application. These buildings are reasonably significant in scale, extending up to 5 floors at the front and within the site. Their removal will therefore open up the site and represent a reduced massing overall. Furthermore, these buildings are not deemed to be of any particular architectural merit and do not warrant consideration as undesignated heritage assets. Their loss is therefore not of concern on heritage grounds.
- 10.49 The retention of the Oldroyd Building is welcomed. It is acknowledged that it can be challenging to find new uses for such institutional buildings and this is considered to be a significant public benefit of the proposal. This would also preserve the setting of the former Dewsbury Infirmary when viewed from Halifax Road and the open space to the west. Aspects of its re-use, in terms of the details of replacement windows will be secured by condition. Details of the treatment of the existing main entrance to the Oldroyd Building, having regard to the iron gates and internal stained glass door feature, also require further consideration and details will be required by condition.
- 10.50 The practical re-use of the Oldroyd Building does require the construction of a new core attached to the eastern façade but set back from the frontage to ensure that the Oldroyd Building remains dominant. In scale and appearance, the core would essentially be 5 storeys. It is intended that it would be constructed in brick to provide a contrast to the stone. The use of recessed brick patterns, deep reveals and varied interventions of glazing and metal

panels would add depth and detail to the façade without competing with the Oldroyd elevation. In principle, the introduction of a core extension and the use of contemporary materials to and reflect its form as a modern addition is acceptable.

- 10.51 At this stage, the actual brick material is to be agreed. The applicant had originally selected a light Weinberger Marziale brick, which was chosen for its textures and varied tone and to create a subtle distinction between old and new by contrasting with the Oldroyd Building rather than trying to replicate or blend into the existing stonework. Officers considered that this brick would be too light. Such a style of buff brick is not characteristic to Dewsbury, being an area in which red brick and stone predominate. Whilst there is no objection in principle to brick, in order to differentiate the modern extension from the original stone form, a final selection of materials has not been made. This is partly a consequence of current supply chain issues affecting the availability of bricks. It is therefore proposed to attach a condition requesting samples of materials to be submitted prior to any works commencing on site. These would need to be viewed on site in the context of the Oldroyd Building and this would provide an appropriate mechanism to control and inform the materials to be used.
- 10.52 In addition to the core, a new reception and custody building would be constructed. The reception area would be single storey and set behind the prominent bay window of the Oldroyd Building. It would be constructed in a combination of brick and cladding with generous areas of glazing to create a contemporary finish. The custody block would be of double height, also constructed in brickwork and glazing. It would sit to the rear of the reception area and consequently, the Oldroyd Building would remain the dominant element within the complex of buildings when viewed from Halifax Road. Due to their recessed position and lesser scale in relation to the Oldroyd Building, the use of a Crest Kingston Gault brick (or similar subject to supply issues) on these two elements of the scheme, which complements the colour of the Oldroyd Building's stonework, is considered acceptable in principle. This would be complemented by a bronzed coloured rooftop plant enclosure.
- 10.53 The final element of the design is the MSCP. This would be multi-level and broadly constructed in a steel frame with the exception of a solid brick wall to the north-facing wall of the car park to provide a solid separation for fire safety purposes to the rear of the residential properties on Stonefield Street. This would also be subject to a condition to secure final details of materials. In terms of its scale, the scheme has been revised in the course of the planning application to further inset the wall of the car park from the boundary of the site. Whilst this is in close proximity, the car park is of a similar scale to the existing buildings on site.
- 10.54 The proposal would also require the construction of a robust boundary line. The boundary wall along Halifax Road would be retained without alteration. The wall along Carlton Road would be broadly retained but would need to be topped with a fence to an appropriate standard. Details of the boundary treatment are ongoing to secure a solution that addresses the requirements of the occupier but is sympathetic to both the CA and the Listed Building opposite. It is proposed that the castellated wall fronting Stonefield Street would also be removed and replaced with a secure fence line to 2.4m in height. Notwithstanding the proposed plans, it is considered that a condition is necessary to secure final details of the boundary treatment before any development commences.

- 10.55 Additionally, the application is supported by a landscape scheme and an Arboricultural Method Statement to ensure good practice in the protection of retained trees during the development. The landscape scheme indicates the retention of the mature trees at the front of the site along Halifax Road, to be retained through measures set out in the AMS. This would be supplemented with additional planting whilst the existing wall planters to the front of the Oldroyd Building would also be retained.
- 10.56 It is also proposed that a landscaped area would be introduced between the rear of houses on Stonefield Street and the access road into the MSCP. Whilst the group of trees on the corner of Carlton Road and Pyrah Street and to the rear of the parking area on Pyrah Street are identified for removal, further planting would be provided to the rear of the site fronting Pyrah Street. A detailed landscape scheme would be required by condition. The Council's Tree Officer has no objections to the principle of the development in this regard. It is noted that the proposal retains the valuable trees on the Halifax Road frontage and provides significant opportunities to improve the landscape and tree scape on the site, subject to appropriate conditions.
- 10.57 Furthermore, the Council's Conservation Officer concludes that on balance the setting of the Northfields Conservation Area would be preserved. Slight harm would be caused to the setting of the Grade II Former Dewsbury Infirmary along Carlton Road. However, its prominence within the townscape of Halifax Road would not be adversely affected by the proposals. The impact of the development on the townscape of Stonefield Street had to be carefully considered due to the scale and massing of the car park but it is considered that landscaping would mitigate that impact to a degree and the wall of the car park has subsequently been recessed in any event. Overall, it is therefore considered that the harm of the proposed development on surrounding heritage assets would be less than substantial.
- 10.58 Having regard to Paragraph 202 of the Framework, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing an optimum viable use. In this case, it is considered that substantial weight can be given to the public heritage benefit of securing a viable long-term use for the Oldroyd Building as a key unlisted building within the Northfields Conservation Area. It is also considered that moderate weight can be given to the enhancement to the setting of the CA arising from the demolition of the late 20th century Kirklees College buildings and the improved landscaping to the Halifax Road frontage. The proposed development would also provide a new police station meeting the operational needs of the WY Police, which is a significant public benefit. The public benefits would therefore outweigh the less than substantial harm.
- 10.59 For these reasons, the proposed scale and appearance of the development is considered to promote good design. Its form, scale, layout and landscaping would also sufficiently respect and enhance the character of the townscape and heritage assets. It is therefore considered to comply with the objectives of Policies LP24, LP32, LP33 and LP35 and guidance within the NPPF.

## Impact on the living conditions of the adjoining occupiers

- 10.60 Policy LP24 of the Kirklees Local Plan advises at (b) that proposals should provide a high standard of amenity for future and neighbouring occupiers. This reflects guidance at Paragraph 130 of the Framework which advises that developments should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.
- 10.61 In terms of the scale and massing of the development, the impact of the proposal on the living conditions of neighbouring occupiers with regard to loss of daylight and sunlight has been carefully considered as part of the application. A range of sections have been provided through the development to take into account existing adjoining properties and a Daylight and Sunlight Assessment Report has also been provided based upon the revised scheme. This Assessment has been undertaken in accordance with guidance and methodologies provided by the Building Research Establishment (BRE) Digest BR 209 "Site layout planning for daylight and sunlight – A Guide to good practice. This is recognised as an industry standard (BR209).
- 10.62 The most significant impact is identified to be the effect of the proposal on existing residents at 8-24 Stonefield Street and 16 Pyrah Street, which adjoin the northern boundary. There will be extensive earthworks across the site, including areas of cut and fill to level out parts of the site to the rear of properties on Stonefield Street. In terms of the direct relationship of the scheme to the rear elevation of the Stonefield Street houses, the sections in relation to the updated scheme identify the following approximate distances to the MSCP:
- 8-10 Stonefield Street – the nearest structures are 14-15 metres from the rear elevations;
  - 16 Stonefield Street – in excess of 12 metres from the rear elevation
  - 20-24 Stonefield Street – the MSCP as originally proposed was between 7-9 metres from the rear elevation of these houses. The upper level of the car park has now been recessed to create a distance of between 15-16 metres.

These distances are considered sufficient to ensure that the proposal would not be unduly overbearing on these properties taking into account the existing scale and position of buildings within the site.

- 10.63 The Daylight and Sunlight Assessment Report uses the Average Daylight Factor to quantify daylight levels and the Vertical Sky Component (VSC), which is the amount of skylight falling on a vertical wall or window. In effect, if the VSC is less than 0.8 times its former value, occupants of the existing building would notice a reduction in the amount of daylight. In this case, with regard to daylight, the performance guidelines relate to dwelling rooms where daylight access is considered to be important. These areas include living rooms, kitchens and bedrooms. The report concludes that although the proposed development would have some effect on the daylight levels of the surrounding buildings' windows, all windows assessed still achieve the recommendations for daylight established within BR209 as they are all over the 0.8 threshold.

- 10.64 With regard to sunlight, BRE guidance states that sunlight provision to living rooms and conservatories is of greatest importance compared with that to bedrooms and kitchens. In this case, the proposed development does have some effect on the sunlight levels of windows to surrounding buildings windows but with the exception of one property, they achieve the BR 209 recommendations for sunlight. There are only two windows to the rear of 16 Pyrah Street that do not meet the BR 209 recommendations with the proposed development in place in winter. One of these is considered to serve a bedroom, which does not have a sunlight requirement under BR209. The other is assessed to serve a dining room or living area, which does have a requirement for sunlight according to BR 209. However, the results show that the BRE recommended hours of sunlight are almost met and due to the fact the existing value for winter is already relatively low, it is considered that any change may not be very noticeable in this instance. On balance, taking into account the existing volume of development on site, the impact of the new development on the daylight and sunlight of existing properties is considered to be acceptable.
- 10.65 It is acknowledged that there are also residential properties within the Boothroyds building. However, the development lies to the north so there would be no expectation of sunlight to these windows.
- 10.66 In terms of privacy, the closest apartment block within the Boothroyds building fronts Carlton Road on the back edge of pavement. This would look towards the extension to the Oldroyd Building. However, because this would be a core facility with stairs and lifts etc. rather than office accommodation, there would be no direct overlooking for any sustained period. The relationship is therefore considered acceptable in this instance. For residents on Stonefield Street, they would principally be looking towards either the custody block, which has limited openings or the wall to the multi-storey car park, which would also largely be blank. As such, it is considered that there would be no undue loss of privacy to these existing residents.
- 10.67 The noise impact of the proposal on the living conditions of existing occupiers has also been fully considered through the submission of a Transport and Car Noise Assessment (NA). This concludes that the most significant noise source affecting the site is the A638 (Halifax Road), but traffic flows on the wider road network are also part of the noise environment. It considers the noise impact with regard to the nearest noise sensitive receptors (the residential properties adjoining the site) that levels to the southern and north eastern facades would be elevated but still fall within the relevant standards. Mechanical plant has also been assessment and mitigation is recommended such as the installation of quieter units and the use of barriers. The latter has been designed into the building. Based upon these mitigation measures, it is concluded that the development would have a low impact on noise pollution. These measures will be confirmed by the use of an appropriate planning condition.
- 10.68 In addition, with regard to any potential disturbance caused by emergency vehicles accessing and egressing the site, the applicant has advised that they have a clear 'blue light strategy'. It is stated that Police Officers are subject to strict training and protocols in the use of lights and sirens only when they are necessary. Furthermore, the majority of emergency deployments requiring such use would be undertaken when the cars would be away from the police station. Whilst the applicant could not state that sirens would never be used when leaving the station, it is very unlikely to be a regular occurrence. Taking

all these matters into account, it is concluded that the proposed development would achieve a sufficiently high standard of amenity for neighbouring occupiers in accordance with Policy LP24 and guidance within the NPPF.

### Air Quality

- 10.69 Policy LP51 of the KLP relates specifically to Air Quality and advises, amongst other matters, that development will be expected to demonstrate that it is not likely to result, directly or indirectly, in an increase in “air pollution that would have an unacceptable harm on the natural and built environment or to people. Where development introduces new receptors into Air Quality Management Areas, it must incorporate sustainable mitigation measures. This is reflected in other policies in the plan, which seek to ensure that current air quality is monitored and maintained, including LP22 (Parking), LP47 (Healthy, active and safe lifestyles) and LP20 (Sustainable travel) which encourages the use of low emission vehicles to improve areas with low levels of air quality.
- 10.70 This approach is also evident in guidance within the Framework, which states at Paragraph 174 that ‘planning policies and decisions should contribute to and enhance the natural and local environment by: e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality’. It is further supported by guidance within the West Yorkshire Low Emissions Strategy (2019), which sets out the regions policies and principles on achieving and maintaining low emission rates.
- 10.71 The application was supported by the submission of an Air Quality Assessment (AQA). The report assesses the impact the development will have on future air quality during the construction and operational phases. Nitrogen dioxides (NO<sub>x</sub>) and particulate matter (PM<sub>10</sub>) were modelled using recognised techniques including ADMS- Roads air dispersion model and other techniques detailed in The Design Manual for Roads and Bridges (DMRB) and Local Air Quality Management Technical Guidance (LAQM. TG16). Modelling was undertaken using a baseline year of 2019 with a future year of 2024 representing the opening year of the proposed development.
- 10.72 During the construction phase, the AQA recognises the risk of dust, arising particularly from demolition and earthworks. The dust emission magnitudes and sensitivity of the surrounding area are combined to determine the risk of dust impacts. It concludes that there is the potential for dust to be generated during the demolition/ construction phase. However, these can be controlled with best practice mitigation measures, including undertaking daily on-site and off-site inspection, where receptors (including roads) are nearby, to monitor dust, erect solid screens or barriers around dust activities and keep site fencing and/or barriers and scaffolding clean using wet methods. Additionally, it would be ensured that cutting, grinding or sawing equipment is fitted or used in conjunction with suitable dust suppression techniques and an adequate water supply is retained on the site for effective dust/particulate matter mitigation (using recycled water where possible). Environmental Health consider that by implementing the mitigation measures listed, these will effectively reduce the impact of nuisance dust affecting the amenity of adjacent receptors to the development site.

- 10.73 During the operational phase, the main impact would be Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>) pollutant concentrations arising from traffic flows. The AQA concludes that this would be below the national air quality objectives. This was based on the current and future traffic flows. A comparison exercise between the previous college and the proposed development identified a net decrease in AM and PM peak periods traffic flows and an overall daily decrease in two-way traffic of up to 117 vehicle trips. The report therefore concludes that the development would have negligible impact on the amenity of existing and future sensitive receptors.
- 10.74 Environmental Health advise that whilst they agree with the approach and methodology of the air quality assessment, they have assessed the application in accordance with the West Yorkshire Low Emissions Strategy (WYLES) - Technical Planning Guidance in which the development would be classed as Major. This is because is within 20m of (A638) Halifax Road which has an Annual Average Daily Traffic (AADT) flow of > 10,000. Therefore, as a major proposal in terms of air quality, a damage cost calculation is required, to be submitted based on the latest DEFRA damage cost toolkit. This would be secured through a condition to include details of mitigation measures to that value. The type of mitigations within the Low Emissions Strategy include the development of car clubs, use of pooled low emission vehicles, shuttle services to public transport interchanges. Electric Vehicle Charging Points would also be required by condition.
- 10.75 Subject to the imposition of these conditions, it is considered that the proposal would comply with the objectives of Policy LP51 of the KLP as well as LP22 (Parking), LP47 (Healthy, active and safe lifestyles) and LP20 (Sustainable travel). It would therefore be acceptable in this regard.

#### Flood Risk

- 10.76 Policy LP27 of the Kirklees Local Plan relates to flood risk and principally where proposals require a Sequential Test. In this case, the application site lies within Flood Zone 1 with regard to flood risk and it is therefore at a low risk of flooding. There are no flooding issues in within the site and because it lies within Flood Zone 1, a Sequential Test is not required. Policy LP28 of the KLP confirms the presumption that Sustainable Drainage Systems (SuDS) will be used.
- 10.77 To support the application, the applicant has therefore submitted a Drainage Strategy and Flood Risk Assessment. It confirms that the proposed development seeks to demolish most of the existing college buildings (apart from the Oldroyd Building) and construct new buildings/car parking within the site. Discharge of surface water is currently to the Yorkshire Water combined sewer via existing connections, with the discharge rate limited to 70% of the current flows for re-developed areas. The existing drainage to retained building and hard surfaces is proposed to discharge unrestricted. The proposed drainage is divided into 4 areas, each discharging via existing sewer connections with flows limited to 70% of the existing rates by 4 flow control devices.
- 10.78 Kirklees Flood Management & Drainage as Lead Local Flood Authority (Statutory Consultee) have confirmed that they can support this application subject to appropriate conditions. These would include a detailed drainage scheme, details of overland flow routing, construction phase surface water management and heads of terms for the maintenance and management of



surface water systems for the lifetime of the site to be secured through the Section 106 agreement.

- 10.79 On the basis of the above, it is considered that the proposal is acceptable with regard to drainage and flood risk. It is therefore in accordance with Policies LP27 and LP28 of the KLP.

#### Ground Conditions

- 10.80 The application is supported by a Phase 1 Report, a Geo-Environmental Assessment and a Site Remediation Strategy. The Phase I report provides an appraisal of the site's history and previous surrounding land uses since the 1800s and an assessment of the environmental setting. From this, it is evident that there have been potentially contaminative uses on the site (and/or the adjoining land) which could impact the development and/or the environment. Potential sources of contamination identified in the report include, but are not limited to, made ground, potential leaks from the boiler room and the petrol interceptor on-site. As such, the report concluded that an intrusive investigation was required.
- 10.81 The findings of the intrusive investigation has been provided. The ground investigation was undertaken in December 2020. Soil sampling and ground gas and groundwater monitoring was undertaken. No visual or olfactory evidence of gross contamination was identified during the ground investigation. Very shallow and shallow coal was identified in several boreholes and from this, the report recommended further ground investigations to determine the coal legacy further. An interim set of ground gas and groundwater results were also provided. Notwithstanding the contents of these documents, Environmental Health consider that further ground gas monitoring information is required to give an accurate appraisal of the ground gas regime and to determine whether the proposed measures would provide adequate protection to the end user. However, Environmental Health are satisfied that these details can be secured by condition prior to commencement. The proposal is therefore considered acceptable on this basis.

#### Bio-diversity

- 10.82 Policy LP30 of the KLP states that the Council will seek to enhance the biodiversity of Kirklees and development proposals will therefore be required to result in no significant loss or harm to biodiversity in Kirklees and to provide net biodiversity gains where opportunities exist. The Council have recently published a Biodiversity Net Gain Technical Advice Note to provide guidance on how Biodiversity Net Gain should be achieved by development within Kirklees in accordance with LP30.
- 10.83 A Preliminary Ecological Appraisal Report has been prepared to support the application. It confirms that a desk top study and field surveys have been undertaken as well as an Ecological Report to assess the potential ecological constraints to the proposed works at the site and recommendations for further survey, avoidance, mitigation, and enhancement where appropriate.
- 10.84 In terms of habitats, the appraisal acknowledges that the most valuable habitats for biodiversity within the development site are the scattered scrub, dense scrub and scattered trees. The proposed development will impact on these by their proposed removal, thus resulting in the removal of suitable

foraging habitat for birds and bats, commuting features for bats and hedgehogs and nesting opportunities. This habitat is likely to support nesting birds during the nesting bird season (March - August) and ample foraging habitat is also present on site, which would be removed. The buildings on site are also likely to have a high potential to support roosting bats whilst the development would be likely to restrict the movement of hedgehogs locally and reduce the amount of available foraging habitat.

10.85 The application is therefore supported by a Bio-diversity Enhancement Plan. With the exception of the Oldroyd Building, the proposed development would encompass the entirety of the site, seeing nearly all current habitats replaced. It is noted that 18 trees are to be retained. These trees vary in age, size and species, which aids in supporting a number of niche habitats for invertebrates, which in turn will benefit the site's biodiversity. There would, however, be opportunities for ecological as part of the future development of the site. The Ecological Appraisal identifies the following:

- Retention of trees on site;
- Creation of native species hedgerows;
- Creation of nectar and pollen rich grassland
- Creation of deadwood piles to support invertebrates and/or hedgehogs;
- Enhancement of existing grassland to create a nectar and pollen rich habitat; and;
- Inclusion of faunal boxes

10.86 In consideration of Biodiversity Net Gain, the site is assessed as having a score of 1.56 Habitat Units and no hedgerow units pre-development. It states that the proposed development would result in the site having a biodiversity net percentage increase of 15.12% in habitat units and no biodiversity net percentage change of hedgerow units. It would therefore achieve 10% BNG.

10.87 The report also recommends that the site has potential to support bats, birds and hedgehogs. As a result, 3 integral bat bricks, 6 bat boxes (on trees), 18 bird boxes (9 on building, 9 on trees), 2 hedgehog shelters and 1 insect log pile are recommended to support the tree planting, soft planting and faunal boxes. These measures would also be secured by condition, including through the submission of a detailed landscape plan.

10.88 The Council's Ecologist has advised that the Net Gain calculations, which indicate that post-development, there would be a biodiversity net gain of 15.12%, would be in accordance with Policy LP30 and the Kirklees Biodiversity Net Gain Technical Advice Note and would be further secured by condition. In addition, a Biodiversity Management Plan and Landscape Environmental Management Plan would also be required by condition. On this basis, the proposal is considered to comply with Policy LP30.

### Sustainability and Climate Change

10.89 The Framework confirms at Paragraph 152 that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure. At Paragraph

154, the NPPF confirms that new development should be planned for in ways that: a) avoid increased vulnerability to the range of impacts arising from climate change and help to reduce greenhouse gas emissions.

10.90 It is acknowledged that the demolition of the existing structures and the construction of new buildings has a footprint in terms of CO<sub>2</sub> emissions. However, in this case, the applicant has submitted a Climate Change Statement in response to the UK target of net zero emissions by 2050 and the Council's Climate Change Emergency. In essence, it confirms that the development would take a fabric first approach, through the following:

- The buildings have been designed to reduce energy consumption, taking a fabric first approach to reduce heating, cooling and other energy loads. The external envelope would all have U-values improved over minimum Building Regulations requirements. The replacement buildings within the Oldroyd Building would also have improve U-values whilst insulating would be added to the roof.
- Heating and cooling the building through electric heat pump technology would give significantly greater usable energy output than energy input.
- The lighting design intelligent lighting controls, which includes daylight linking to reduce energy consumption in artificial lighting;
- The building would incorporate a 21kWp (160m<sup>2</sup>) solar array that would contribute to decarbonisation of the grid. Details of these solar panels would be secured by condition;
- The all electric design allows the building to be net zero when energy is sourced from net zero suppliers. The building user can reduce the building carbon emissions to net zero prior to the full decarbonisation of the grid by their energy purchasing decisions.
- Electric car charging is incorporated in the design reducing emissions associated with staff vehicle usage.

The applicant was also asked to consider the introduction of a Green Wall to the MSCP to the elevation facing the residents on Stonefield Street. However, it has been advised that due to the proximity between these structures and fire regulations within Building Regulations, a Green Wall would not be permitted in this location due to the potential fire risk associated with dry plants. This has been confirmed by the Council's Building Regulations Team.

10.91 Overall, it is considered that the applicant has given sufficient consideration to the impact of the proposal on climate change. However, in order to clarify these measures, a condition is recommended to require details of measures to promote carbon reduction and enhance resilience to climate change prior to the commencement of construction on site to ensure that these measures can and are delivered.

## Response to Representations

- 10.92 The representations to this application relate principally to the highway impact of the proposal, including the effect on car parking provision on Stonefield Street and the physical impact of the buildings on living conditions and privacy. It is considered that these matters have been fully addressed in the report above although the key points are addressed again below:

Creating the entrance onto Stonefield Street would cause severe traffic issues especially at certain times of the day. By also creating 2 gates, this would diminish the parking spaces available on the street.

**Response:** Officers are satisfied that there is no alternative to the creation of two access points onto Stonefield Street for the reasons set out in the report. The impact on parking bays and the availability of existing parking bays is fully set out in the report.

Parking areas currently designated on Stonefield Street will have to be removed to accommodate the new access. The surrounding areas that include Hope Street and Tolson Street has parking issues currently so the loss of parking on Stonefield Street will leave residents with no parking.

**Response:** The applicant's parking survey has demonstrate that there is parking capacity within the exiting parking bay provision. Furthermore, there would be no net loss of parking pay spaces as a result of this proposal, albeit in a modified location.

Access onto Halifax Rd via Stonefield Street is precarious at the best of times. One of the major concerns relates to peak times; morning school run and school finishing – this junction is extremely busy with most of the traffic feeding onto Oxford Rd to access the two high schools. Coupled with cars leaving after dropping off learners to gain access onto Halifax Rd. This is repeated in the morning and after school finishes.

**Response:** The Halifax Road/Stonefield Street junction has been fully assessed in the course of this application as set out in the report.

A mosque is situated towards the bottom end of Hope Street. The mosque is used between 1700 – 1900 Mon to Fri and Sat morning between 0900 – 1100 for young children who attend classes. Parents are dropping and collecting their children from around 1645 to 1705 and then collecting from 1850 onwards. These times are extremely busy with traffic backing on Stonefield Street often up to the Hope Street junction trying to access Halifax Road.

**Response:** The traffic generated by the Mosque is an existing situation. Furthermore, the shift pattern for the proposed Police Station sits largely outside the typical morning and evening peak. For example, the TA suggests a maximum of 26 evening peak hour vehicle movements between 17:00 to 18:00 on Stonefield Street, which could not be considered significant either individually or cumulatively. The hours of 0900-1100 would also sit outside the Police Station peak.

The Mosque traffic - every weekday to the school at the bottom of Hope Street, upwards of 200 children and their parents attend yet in the research these car visits are not reflected in the projected traffic flow. The research also underestimates the impact of school traffic in respect of the two schools at Oxford Road.

**Response:** The application would deliver improvements to visibility at the Stonefield Street/Halifax Road junction. Furthermore, the visits to the Mosque would be at a specific time(s) that would not conflict with the peak shift change at the Police Station. The majority of movements into the site would also be from Carlton Road.

St Johns Lodge – This is often used on an evening and parking by patrons. They are predominantly blue badge holders who park on the double yellowed areas on Stonefield Street. This is always a health and safety concern when it clashes with the mosque traffic.

**Response:** Any unauthorised parking on double yellow lines is an existing situation that would not be exacerbated by the proposed development.

## **11.0 CONCLUSION**

- 11.1 This application seeks full planning permission for extensive site clearance and demolition across the former Kirklees College site, the retention, extension and conversion of the Oldroyd Building and the construction of new facilities to provide a new Police Station for Dewsbury. It would constitute a sui-generic use (i.e. it would fall outside any specific Use Class).
- 11.2 As set out in the report above, the site is unallocated in the Local Plan. As such, it is not designated for any specific use and this application is therefore considered on its individual merits. A full assessment of technical matters pursuant to the development of this site has also been carried out, including highways, air quality, drainage and biodiversity. It is considered that they have all been satisfactorily addressed subject to appropriate conditions or heads of terms within the Legal Agreement. The design and heritage impact of the scheme and the effect on the living conditions of adjoining occupiers are also considered to be acceptable.
- 11.3 The NPPF has introduced a presumption in favour of sustainable development. The policies set out in the NPPF taken as a whole constitute the Government's view of what sustainable development means in practice. As detailed in this report, the application has been assessed against relevant policies in the development plan and other material considerations. For the reasons set out, it is considered to accord with the development plan when considered as a whole, having regard to material planning considerations. The proposal would therefore constitute sustainable development and accordingly, it is recommended for approval.

## **12.0 CONDITIONS (Summary list. Full wording of conditions including any amendments/additions to be delegated to the Head of Planning and Development)**

1. Time limit for implementation.
2. Development carried out in accordance with the plans and specifications.
3. Construction Environmental Management Plan (including consultation with surrounding residents and details of construction access points).
4. Details of materials, including samples.
5. Large scale details of replacement windows and doors to the Oldroyd Building.
6. Details of the Halifax Road gate and new door.
7. Detailed scheme for the improved visibility at the Halifax Road/Stonefield Street junction (including the relocation of the bus stop).
8. Car park management plan.
9. Full Travel Plan.
10. Defects survey of the condition of the highway along the Halifax Road, Stonefield Street and Pyrah Street site frontages before and after development and the reinstatement of any defects as a consequence of development.
11. Electric Vehicle Charging Points
12. Submission of a Phase 2 Intrusive Site Investigation Report
13. Submission of Remediation Strategy
14. Implementation of the Remediation Strategy
15. Submission of Validation Report
16. Implement Agreed Noise Mitigation Measures
17. Limited on the combined noise from fixed plant & equipment
18. Tree protection measures during construction
19. Landscape scheme – detailed soft and hard landscaping
20. Details of boundary treatment
21. Details of the Halifax Road gate and new door
22. Bio-diversity enhancement measures in accordance with Biodiversity Plan (BEMP) to include new nesting opportunities for swift the potential for faunal boxes for other species integral to the new buildings.
23. Landscape and Ecology Management Plan (LEMP).
24. Drainage details
25. Details of overland flow routing
26. Construction phase surface water plan
27. Separate systems for the drainage of foul and surface water
28. No piped discharge of surface water until the completion of surface water drainage works.
29. Details of measures to promote carbon reduction and enhance resilience to climate change prior to the commencement of construction on site.
30. Details of the solar array.

### **Background Papers:**

Application and history files:

<https://www.kirklees.gov.uk/beta/planning-applications/search-for-planning-applications/detail.aspx?id=2021%2f91508>

Certificate of Ownership – Certificate A signed on 9 April 2021.