

Outline Planning Application for a new settlement on the edge of Huddersfield (Ref. 2020/92546)

Huddersfield Civic Society objection to Outline Planning Application (OPA) 2020/92546 (21 September 2020)

In this objection, Huddersfield Civic Society raises 10 key points, which we believe are important for the successful delivery of this development scheme. These are:

- Holding the developer to the commitments made in the OPP
- Site remediation
- Community facilities on the edge of town
- School places
- Travel plan
- Wider impacts of increased traffic
- Sustainable housing design, energy and home working
- S.106 commitments
- Affordable Housing commitments
- Biodiversity and trees

This OPA is a rework of the rejected 2019 application, which claims to address a number of objections last time round. However, several of the applicant's documents still describe the position around 2017.

Holding the developer to the commitments made in the OPP

One key issue HCS wishes to raise is about the effectiveness of the *master plan* prepared for this site and the ability of Kirklees Council to ensure the *community facilities* and the *affordable housing* remain intact throughout the process from Outline Planning approval to delivery.

It is important that commitments made by the applicant in the Outline Planning application are locked into the completion of the development by any and all developers and during all phases. This is imperative in light of the difficulties likely to be encountered with site remediation, and a strong possibility that the scheme will be delivered by more than one developer, as occurred in Lindley Moor.

Site remediation

There are three phases of development. The construction is assumed to take ten years to final completion. One of the biggest issues is the contamination of parts of the site by submerged structures, heavy metals, dangerous chemicals and asbestos. We assume the geo-environmental assessment's recommended remedial work, such as installing '600mm cover system within all proposed garden areas' will be costly.

We propose that the developer is mandated to undertake the required land decontamination work across the full site at an early stage.

Our concerns are two fold. If the land is not effectively remediated across the whole site before commencement of any and all building works, there could be side effects. This should be a requirement to reduce the risk of Phase 1 and/or Phase 2 residents moving in to find they are living alongside decontamination work for later phases, which has undesirable risks.

The second is about the effectiveness of any remedial works. We note the obligations on the developer for remediation, however, if the whole site is not effectively remediated and to a depth that allows for further improvements on site, such as, tree planting, utility works and extensions to properties, the 600mm depth will be insufficient.

Community facilities on the edge of town

We believe that master planning is critical for such developments. A broader relationship between people and place-based activities is within the DNA of Kirklees Council we are told; however, it appears that (while outline planning), there appears to be little consideration as to how this will work in practice. New communities need a heart, especially at a time when communities are changing.

The assumption that supply and demand will cover additional facilities required is understandable, however, if these are not

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planned into the master plan, they can become incompatible with the new community. We would like to see allocation of space for these developments, so it is an integrated approach to place-based living and working.

For those that can work at home or in the community, these spaces need to be designed in, so they are cohesive and engaging. The area needs to be considered a community (and potentially an expanding one) and not just another housing development to meet home building targets.

There needs to be embedded in the application better and more considered range of community facilities. This should be an obligation on the developer(s) and not something that can be chipped away at through planning negotiations, to a degree that the area has limited facilities.

This will become more important over time as the present infrastructure is inadequate to support a much larger population than at present in Crosland Moor/Crosland Hill. There is a presumption that further additions to the housing stock will be located on the edge of town in the Crosland Hill area.

There will be significantly greater demands on existing community facilities. Those facilities that are available - in Crosland Hill, Crosland Moor, Beaumont Park and Linthwaite are sufficiently distant (and require travel along Blackmoorfoot Road, a busy narrow route to villages outwith the town) and may generate considerable growth of motorised traffic if there are not enough facilities within easy access.

Whilst the master plan provides some community facilities (village centre) – doctor's surgery and community centre, there is a need on site for other community facilities that are within easy walking and cycling distance of residents (e.g. shops on the site, a community hub with digital facilities for working out of the home, having meetings, a change of environment while working) as well as easier access on the site with more frequent bus services.

School places

The provisions for a primary school on the site or in close proximity in Crosland Hill should be part of the infrastructure requirements of this level of growth in edge of town housing. We appreciate that there are logistical issues with timing and growth patterns due to the phased development, however, if facilities are not part of the master planning, then there will be no space allocated for them when they are needed most.

The school places assessment suggests there will be sufficient primary places but inadequate secondary places. With developments of this scale we would suggest that there is a requirement for a primary school onsite in Crosland Hill to avoid the combination of developments in the ward resulting in an absence of nursery and primary school places in close proximity.

The nearest primary school (at School Lane, Linthwaite) is not expected to have places, given the level of new development that has occurred in the Linthwaite area. The recently completed 630 place Beaumont primary in Dryclough Road/Woodside Road is cited as the most likely to have available places, although it will receive additional children from new developments in the ward in the meantime (e.g. from new housing on the St. Luke's Hospital site and large scale Netherton developments that are expected to outpace the local school facilities in Netherton).

If Beaumont Primary is adopted as the preferred primary school facility, the walk/cycle to school route along Blackmoorfoot Road and Dryclough Road will require considerable attention.

The assumption that nursery and primary school children travel to Dryclough Road (over a mile away and largely on a busy road) is likely to create significant additional traffic generation during peak hours.

Travel plan

The travel plan as written is very detailed but it appears to exist in a world that most residents in the neighbourhood would not recognise as reality in 2020.

Neither does it provide a plan fit for a development that could be completed in 2030, when we anticipate, as part of a low carbon economy, that we will be shifting away from car use towards active travel, greater use of public transport and putting more emphasis on home working (see below). The recent West Yorkshire Combined Authority (WYCA) Carbon Emissions Reduction Pathways, suggests in the Max Ambition Scenario (the closest to meeting Net-Zero Carbon by 2038), that private car use will decrease by 43% (source: *Element Energy Pathways Report, Page 27, July 2020*).

To cope with additional demands will necessitate some upgrading of the road, cycle and footpath networks and restricted access to existing residential areas, to reduce “rat runs”.

This housing development with over 2000 additional people, will generate greater through traffic on Blackmoorfoot Road and affect Meltham Road and Manchester Road.

Given the size of the overall development, there needs to be further consideration of the convenience of current facilities and services and where additional facilities and services could be provided.

The main existing services are about one mile from the site entrance at the junction of Blackmoorfoot Road and Dryclough Road and consist of a range of shops including a post office/newsagent, mini-market, greengrocers, bakery and fish and chip shop. At the Park Road West junction with Blackmoorfoot Road is a small Cooperative supermarket, a pharmacy and other small shops, which is 1.25 miles from the site. In Gilroyd Lane, Linthwaite closer to parts of the site in Felks Stile Road, there is a minimarket and petrol station), accessed via School Lane.

With safer walking and cycling facilities on and off local roads and footpaths, residents will be able to access shops and services without a car. If we include the travel to school options, which should be possible to undertake safely by bicycle or on foot, this becomes increasingly important to address in an attempt to tackle the likely traffic generation of such a large development located on the edge of the urban area of the town.

For this development to go ahead with the anticipated additional traffic generation, improved facilities for pedestrians (i.e. better footways) and in some case (e.g. Felks Stile Road) the introduction of footways on or adjacent to roads (with possible cycleways as well) that will be heavily used by pedestrians (and cyclists) should be required. There is also a need for increased or rerouted bus services to serve the site.

There is also a need to factor in fast and rapid chargepoints across the site. While planning requires off-street housing to have slow chargepoints, it is typical that when it comes to on-street parking there is little consideration made. We would like this to be part of the conditions of granting the application. Additionally, with the uptake of eBikes the charging and secure storage facilities needs to be integrated effectively into the development.

Similarly, access to bus services would be preferable on the site, albeit at the entrances, so as to make travelling by bus and carrying shopping from bus to residence a practical alternative to car travel.

There are some specific inadequacies in the transport plan. A roundabout at the junction of Sands House Lane would help to reduce speeds and manage the traffic in Blackmoorfoot Road and could form the entrance to the site.

This development (and others that may be approved in parallel in this ward) will have an effect beyond the immediate roads affected in the applicants travel plan. We wish to see attention given by the applicant and Kirklees Council to the traffic effects on existing neighbourhoods close by.

Wider community impacts of increased traffic

Traffic from this housing development will have an effect on roads and communities that are linked to Blackmoorfoot Road. Although the applicant has looked at the impact on Manchester Road, we believe that the real effect of this development will be felt by residents, businesses and schools through increased traffic passing through adjacent residential neighbourhoods on local shopping trips, school travel, travel to work (commuting) and

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home deliveries. This occurs already and creates congestion and noise in narrow hilly lanes such as Hanson Lane, Beaumont Park.

The impact of this traffic travelling through adjacent communities to access site is likely to be felt in the following routes:

- Linthwaite (via Felks Stile Road and School Lane)
- Crosland Hill Road (via Deep Lane to Manchester Road)
- Blackmoorfoot Road (below Crosland Hill Road in direction of town centre)
- Balmoral Road/Butternab Road (to Meltham Road)
- Dryclough Road (access to three schools serving c. 2,500 pupils/students)
- Woodside Road (lower end) /Beaumont Park Road/Hanson Lane (to schools, park and Meltham Road)

We propose that this effect can be mitigated to some degree by the adoption of low cost Low Traffic Neighbourhoods (LTN) (see [*Gear change: a bold vision for cycling and walking* Dept. for Transport 27 July 2020](#)). LTNs would effectively reduce or halt the through traffic (rat runs) by use of road closures, introduction of one-way traffic and reduction of road space that encourage walking, cycling and improve road safety. However, there needs to be consultation, good design and detailed consideration of the knock-on effects to other areas where this is introduced (as has been demonstrated in LB Waltham Forest.)

This would necessitate that the main arteries are used more fully (e.g. Manchester Road, Meltham Road, Blackmoorfoot Road, Park Road). These would need to be improved, with controlled parking and deliveries as well as provision for walking and cycling.

We propose that S.106 funding be allocated for consultation on Low Traffic Neighbourhoods in the following areas close to the proposed development: Crosland Hill; Balmoral Road/Butternab Road; Dryclough Woodside Moor End (with schools) and Beaumont Park (with Friends of Beaumont Park).

To protect existing roads nearby used for walking and cycling we suggest that *Quiet Lane* status be designated to Heath Lane (Blackmoorfoot to School Lane) and that Thewlis Lane/Nether

Moor Road is protected from traffic (after the Johnson's Quarry entrance) with introduction of a "*No Motor Vehicles, Except for Access*". This means that only people who have a legitimate reason for serving a property on those streets may pass the sign. Nether Moor Road has a narrow cobbled hill section, an unpaved section and a very narrow entrance about 6' wide on Meltham Road, yet is still a permitted through route for traffic, which will increase as activity in the area grows.

Sustainable housing design, energy and home working

Outline Planning Applications are only the first stage in this process but our submission seeks to raise the quality and energy efficiency and potential energy sources) of the homes before the application moves into more detailed specifications.

Homes are becoming far more than just living accommodation, as COVID-19 is demonstrating.

The requirement for living and working sustainably in energy efficient houses needs to be part of a wider appraisal of the likely carbon impact of this development once occupied and how that fits with UK obligations to meet Net Zero Carbon by 2050 (UK legislation) or indeed Kirklees Council and West Yorkshire's 2038 targets.

The orientation of buildings is, for instance, something that other housing estates are now addressing at the earliest stages so that solar gain is increased (Winter) and reduced (Summer). However, to achieve the best results, the design of the properties needs to take into consideration the layout of the estates.

With the introduction of the Future Homes Standards, consulted on in 2019 by the Ministry of Housing, Communities and Local Government (MCHLG), there is a marked anticipation of improvements in housing stock energy efficiency and renewable energy requirements. This development spans a critical period for Kirklees Council and the community when it comes to decarbonisation, with a continual halving of the emissions every 5 years (the biggest amounts in the first two 5-year periods). However, this is not just about meeting our carbon targets, homes

have to be affordable and comfortable to live in. With climatic changes we have seen recently, it is important that Kirklees Council encourage and where possible demand the highest of standards. Without this, these properties may not be as desirable in the future and may affect the community balance.

Energy for electricity, heating and cooling is an important aspect of decarbonising the district. This can be done on a house by house basis or as community energy. We would encourage the Council to consider, in collaboration with the developers' appropriate renewable energy delivery strategies. The Council is already considering a District Heat Network for the town centre and this development, along with other close development sites may be appropriate to consider similar energy supply. However, the provision of photovoltaic panels and battery storage and heat pumps may be an appropriate alternative solution.

It is important that not only houses are considered in the energy mix, but any open-air car parking facilities are designed to maximise the space above the cars with photovoltaic panels to generate community energy. This could be complemented by appropriately sized wind turbines.

Given the changes in energy mix likely to take place over the next 10-20 years, it will be important that homeowners do not have to retrofit their properties with added insulation or non-fossil fuel renewable energy because building targets took precedence over future-proofing buildings. Carbon intensive fuels are likely to get more expensive for the consumer and this should be reflexed in the outline planning application and full applications.

Add to this electric vehicle use and the associated electrical demand, the development needs to be fully evaluated for the energy demands of the coming decades.

To tackle the decarbonisation of the whole site would need the developer to adopt a pro-active integrated approach to energy generation and use, such as district tri-generation networks (power, heat and cooling) as well as the technologies above (this is all currently available technology).

To reduce the carbon footprint of the development will need an investment in assisting residents to reduce journeys due to work. Switching to active travel or public transport, as important as they are, does not deal with the lessons of Covid19, which will have long-term consequences on work patterns.

Residential developments for the 2020s need provision for properly designed work spaces in the home, digital facilities to do that (fibre network) and the option to use space in the community hub that allows for local working out of the home, for meetings (bookable spaces) or for a change of environment, where there are toilet and cafe facilities. If houses have limited space for working in, we know from current experience it affects peoples' wellbeing and mental health.

S.106 commitments

The S106 agreements need to cover tree planting, greenways, parks as well as highways access changes, footpaths, cycling facilities and consultation in affected neighbourhoods on Low Traffic Neighbourhoods.

Affordable Housing commitments

The applicant appears now to have added a lot of 'affordable housing' in the overall house numbers but this commitment is not then described in any detail. We would suggest that affordable housing needs to be located centrally near the community hub and with easy access to bus services and as part of an integrated community and not put in isolated specific areas.

Biodiversity and trees

We recognise that there are some good features in the masterplan: tree planting, linear greenways, pocket parks, and a square. We note that Kirklees Council's tree assessment suggests the applicant needs to improve landscaping and we are dismayed at the loss of mature trees, which should be kept to a minimum, particularly where it provides barriers to traffic noise.

To complement the trees and biodiversity we would like to see natural water management wherever possible through SUDS.