

<b>Consultation Response from KC, Conservation and Design</b>
<b>2021/92206 Land Off, Woodhead Road, Brockholes, Holmfirth</b>
<b>Erection of 137 homes with open space, landscaping and associated infrastructure</b>
<b>Date Responded: 25.03.2022</b>
<b>Responding Officer: Nick Grimshaw</b>
<b>Responding Ref:</b>

## **1. Context.**

- 1.1 Comments were provided on this development in 20/09/21 raising a number of concerns, some of which have been partially addressed. Reference is made to the previous comments which broadly remain valid.
- 1.2 This is a prominent and important site which is detached from the flanking settlements. It is acknowledged that this is an allocated housing site (HS161 - Land East of Woodhouse Road, Brockholes) and consequently the fundamental planning requirement is that the development should deliver a "*high quality, beautiful and sustainable*" addition to its context (NPPF para.126). Unfortunately, the changes to the proposal do not fully address this simple expectation, or the requirements of the Local Plan allocation (HS161).
- 1.3 As previously the proposed development has been considered in the context of the above and the requirements of: NPPF paragraphs 130,131,134 & 174, Local Plan policies LP7, LP24, LP30 & LP31, and the Kirklees Housebuilders Design Guidance SPD. The primary objective at this detailed design stage should be to ensure that the proposal will deliver a well-designed place which demonstrably add to overall quality of the local area.

## **2. The changes to the proposed development.**

- 2.1 The proposal changes to the previous layout appear to be modest, consequently the previous concerns have not been significantly addressed in the revised plans.
- 2.2 The development continues to be read as insular with little or inadequate physical or visual connection to its context including the flanking greenspaces. The site would reliant upon access by private vehicles and is isolated from the local centres and public transport.
- 2.3 The proposed development would result in some significant adverse impacts upon the defining landscape features of the site and its context, which are not mitigated or outweighed by the quality of the resultant housing layout. The main changes seem to be a change in house types.
- 2.4 The historic public rights of way which cross the site from Woodhead Road remain poorly integrated into the proposed layout (HOL/31/40 and Smithy Place-HOL/31/60) and become incidental, rather than integral, to the design solution. In the case of HOL/31/40 the character of the PROW as an access across the fields continues to be part of the hammerhead turning to access units 11, and 5 – 8.
- 2.5 The proposed POS is also poorly integrated into the design solution and would be dominated by main access roads, the embankment to Woodhead Road, and hard surfaced turning areas (such as adjacent to units 119 – 122. Similarly, the proposal for the area flanking the River Holme would be characterised by blank gables with no obvious physical or visual connections

to the enclosing space. The character and use of the open-space would be continue to be compromised by the boundary fences of the east side of the development with little natural surveillance, or even clear access, to identify the POS as part of the housing layout.

- 2.6 The revisions have retained some important tree groups, but the new road layout continues to fail to provide any new street trees as required by NPPF paragraph 131. The potential to enhance or reflect the site's key characteristic defined by the enclosing tree groups has not been addressed.
- 2.7 The proposed main north-south access road remains focused on the pumping station which would be an unfortunate terminus to this streetscape. This spinal street would also continue to be dominated by hard-surface, frontage car-parking, with no integration of street trees.

### 3. **Conclusion:**

- 3.1 The revised proposal presents few evident changes which would address the impact of the development on this historic landscape. The main alterations appear to be minor and focused on housing types rather than a reconsideration of how to integrate this development into this detached and sensitive site.
- 3.2 Unfortunately, the current proposal continues to fail to respond to the challenge and potential of this greenfield site as required by the expectations of national and local guidance and policy. The revised layout remains an insular collection of cul-de-sacs. Therefore, the modest changes have not sufficiently addressed the key concerns previously outlined. The proposed development consequently continues to fail to meet the requirements of the NPPF paragraphs 130, 131, 134 and 174, as well as Local Plan policies LP7, LP24, LP30, 31 in terms of creating a well-designed place which complements the quality of the local area.