

**Summary of HVPC comments on application 2023/62/91212/W**  
**- proposed Bankfield Drive development, Holmbridge.**  
**December 2023**

This is the second time Holme Valley Parish Council Planning Committee have commented on this development proposal, please also see our comments outlining concerns from the meeting on 22 May 2023. Given the large number of neighbour representations, it is a matter of regret that there was no prior consultation between the developers and the Parish Council or local residents. Had this taken place, at least some of the concerns that are currently being expressed by residents might have been addressed in advance of submitting this revised application.

Although there have been some changes to the proposal, the revised application still falls short of what would be expected on several issues. Holme Valley Parish Council would like to draw attention in particular to the following:

### **Affordable Housing**

Changes have been made to this application by the inclusion of 4 “affordable” 2- and 3-bedroomed houses. Whilst the Parish Council welcome the inclusion of affordable homes this still fails to meet the concerns expressed by the Parish Council and Kirklees about affordable housing provision, particularly as none are intended for rent. According to the Kirklees Local Plan, developments should:

- Include a mixture of one, two and three-bedroomed properties for sale **and** rent.
- Include housing designed to meet the needs of older people and properties for first-time buyers.

The proposed development does not meet these requirements. The inclusion of an additional 5 houses also increases the density of housing on the site by a third whilst still failing to meet the required criteria concerning housing mix.

### **Climate Mitigation**

In 2019 both Holme Valley Parish Council and Kirklees Council declared a climate emergency and as such we would expect climate mitigation to be at the forefront of all decision making, particularly on new development proposals. Developers should be expected to build properties with solar panels, electric vehicle charging points, and heat pumps (air or ground source) rather than gas condensing boilers. The potential for a community energy project should also be considered.

### **Highways and Road Safety**

The increase from 16 to 21 properties sees an increase in the expected level of car ownership on the site, with provision for parking increased to 51 vehicles, which will result in an increased amount of traffic, particularly in peak hours.

In this context, the Transport Statement Addendum (id 10114390) assessing the impact of the proposed development on traffic using Dobb Top Road/Laithe Bank Drive/Bankfield Drive is of particular significance because the estimates of traffic flows on Dobb Top Road are questionable as a result of deficiencies in the traffic data collected.

The recording device used to collect these data was positioned at the top of Smithy Lane and therefore only recorded traffic using Dobb Top Road to access Smithy Lane and vice versa - it does not record other traffic travelling along Dobb Top Road in either direction. In this context, the following should be noted:

- Dobb Top Road is key part of a rural school route used daily by parents and children. It is narrow and frequently obstructed by parked vehicles but there is only one section of footpath approx. 30 metres along its entire length - approx. 600 metres.
- The proposed development may also be accessed by both of these routes and any such movements cannot have been recorded.
- Therefore two out of the three possible routes that traffic from this development and other local road users might use involving Dobb Top Road are not recorded in the traffic flow data.

The report then goes on to argue on the basis of these flawed data that the peak hour traffic generation is well below the accepted threshold in both peak hour periods and therefore no further assessment is required. It concludes that the proposed development will not result in a material impact on the operation or safety of the local highway network.

It is also important to note that the report indicates that there were no PSVs included in the total vehicle count. However, Dobb Lane, Dobb Top Road and Smithy Lane are used by the H5 bus service provided by Stotts which runs hourly from 09.30 - 16.30. This casts further doubt on the weight that can be placed on the report, and its conclusions are clearly questionable given the limitations of the data collected by the traffic survey.

In view of this, it is evident that the report's junction capacity assessments may be inadequate and that further, more rigorous assessment is required.

In the light of these concerns, careful consideration should also be given to imposing a 20mph speed limit on Dobb Top Road should the development go ahead.

The introduction of an anti-skid/high-friction surface at the junction of Bankfield Drive and Dobb Top Road whilst welcome will likely not be sufficient to reduce the risk of skid-related accidents when the road is covered with snow and ice, remembering that neither Bankfield Drive nor Laithe Bank Drive are gritted during winter months.

In addition, it should also be noted that the proposed installation of a 325mm high safety kerb to address this issue will reduce the width of an already narrow road by approximately 0.5 metre. The installation will also require substantial infill work up to the boundary stone wall because of the steep camber that has developed on the northern side of the road.

The Transport Statement Addendum concludes that it has demonstrated that additional traffic generated by the development can be safely and satisfactorily accommodated on the local highway network and that there are no further highway or transport related issues that would prevent the application from being granted planning consent. On the basis of the omissions and concerns outlined above, this conclusion is very much open to question. This, in turn, calls into question the decision to increase the number of proposed properties from 16 to 21.

### **Drainage, Run-off and Saturation of Adjacent Land**

There are concerns identified by many residents about issues of drainage and water supply to and from the proposed site (in terms of water supply, surface water drainage capacity and risks of land slips and flooding), the stability of the adjoining field when saturated, and concerns that assessments to the situation were carried out in a drier period during early summer 2023, while during late summer and autumn 2023 the Holme Valley has experienced a period of exceptional and prolonged precipitation that should be taken in to account. Two consultee reports from the Kirklees Lead Local Flood Authority (most recent November 2023) also reflect that developers have not addressed this issue to a satisfactory conclusion in the plans.

### **Holme Valley Neighbourhood Development Plan**

The mission of the Holme Valley Neighbourhood Development Plan is to protect and enhance the landscape and character of the Holme Valley. Although this does not aim restrict the development of much needed housing for local people a balance must also be found, and serious consideration should be given to a development of houses with this high level of intensity. Owls, brown hares, hedgehogs and deer have known habitats in this area and lower density housing will help to prevent further biodiversity loss. It is also disappointing to see that the housing construction uses many non-natural materials such as artificial stone and concrete where natural materials would be preferred, particularly so close to the Peak District National Park, which is just 600 meters away.