

**Consultation Response from KC,  
 Conservation and Design**
**2021/92086 land at, Bradley Villa Farm, Bradley Road, Bradley, Huddersfield, HD2 2JX**
**Erection of 270 residential dwellings and associated infrastructure and access**
**Date Responded: 09.07.21    Responding Officer: NG    Responding Ref: HS11 / HUD 11/237**
**Premature development proposal.**

This development is the western-end component of the neighbourhood-scale housing **Local Plan housing allocation HS11** described as 'Land north of Bradley Road'. The delivery and completion of the HS11 site allocation will effectively result in a substantial new neighbourhood, including necessary local facilities and amenities. Consequently, the principle of the development of the HS11 site is established in the Local Plan, subject to the requirement that the development is brought forward in the context of a comprehensive Masterplan.

The currently proposed Redrow housing development is a **component of the HS11 allocation**, located on arable fields at the western end of the intended Masterplan area. However, as the Masterplan has yet to be designed or adopted the proposal should be considered on its own merits, including whether this element compromises the sustainable development of the wider HS11 site allocation.

To date the required Masterplan has not been designed, detailed or adopted. Given the scale of the overall development, in accordance with the principles of the National Design Guide (quoted page 9 of the submitted D&AS) the delivery of the Masterplan for the site should be informed by detailed 'Design Codes' to ensure a coherent approach to the delivery of the site allocation. The proposal does not include Design Codes and is not read as a component of the wider site allocation, except in the apparent justification to avoid meeting the minimum necessary Open Space requirements for a site proposing 270 homes (see below).

The proposed Redrow housing development is, therefore, **considered to be premature** given the requirement to frame the development within a Masterplan covering the wider site and one which potentially compromises aspects of the wider HS11 development, as discussed below.

The local plan policy and the scale of the overall HS11 development demands that this allocation must be informed by the agreed parameters of an adopted Masterplan which would frame its delivery (which will over some years). The site-specific considerations for the HS11 allocation are extensive and include a number of key services, including schools and a local centre, with which the Redrow housing layout would need to contribute to, as well as being demonstrably connected and accessible across the allocated area. However, the submitted layout only includes suburban-style housing (with a heavy emphasis on vehicle parking) and no clear indication of how to accommodate or connect to the required community services or how the Redrow scheme would contribute to a viable green infrastructure, recreational or wildlife corridors.

The policy required HS11 Masterplan would (in accordance with best practice and National and local design policy) define the structure, design form and delivery of the development as a whole, ensuring its integration with the enclosing area and that the resultant settlement can be characterised as a definable and sustainable place. Unfortunately, the premature and isolated nature of the Redrow scheme means that it does not currently meet the design requirements of the Local Plan allocation HS11, Local Plan Policies LP5 and LP24 or NPPF paragraph 127.

**The current Redrow housing proposal.**

As a minimum, the necessary HS11 Masterplan should also be informed by detailed 'Design Codes' to establish delivery, design details and materiality standards, as well as creating the potential to define a degree of architectural cohesion required by a new place and crucially defining the accommodation of green spaces and space for wildlife etc

Unfortunately, it is not possible to evaluate the overall impact of the indicative Redrow housing layout without the confidence of knowing how the proposed scheme would actually contribute to the delivery of the wider HS11 Masterplan, including the necessary neighbourhood facilities (none of which are included within the Redrow site boundaries. Nor is it possible to establish a design-quality benchmark, in accordance with the principles of the National Design Guide, Local Plan policies LP5 'Masterplanning sites' and LP24 'Design' or the recently adopted Kirklee House builders SPD.

The proposal consequently does not currently meet the design requirements of the Local Plan allocation HS11, Local Plan Policies LP5 and LP24 or NPPF paragraph 127.

Given the lack of wider development context, the currently proposed Redrow housing scheme should be **considered on its merits**. The proposed housing layout viewed in isolation is effectively a large cul-de-sac, located on extensive arable fields, accessed from the west from Bradford Road and enclosed to the east by Shepherds Thorn Lane. The latter is a narrow farm access and public right of way, lined by established hedgerows and which defines the rural-edge character of the boundary with the gold course.

The following highlights housing layout design issues which relate specifically to the submitted Redrow Scheme.

- **Inadequate local amenity provision.** The extensive site-specific amenity requirements for the HS11 allocation are not included in the current Redrow submission, except in its justification to avoid the minimum necessary Open Space requirements for a site proposing 270 homes (by almost 1ha). There is a presumption that the adjacent part of the indicative/future Masterplan would compensate for the under-provision of required open space (page 17 D&AS). While the future development of the allocated HS11 site may provide additional open-space provision, this would be located some distance from the Redrow site, is not currently planned or committed and consequently could not be taken to compensate for the under-provision open space on the Redrow site. The enclosed Redrow site should be reviewed to meet the minimum open-space standards.
- **Impact on heritage assets.** The Redrow site does not contain any designated heritage assets but lies adjacent to the Shepherd's Thorn Farm complex which includes an C18th, grade-listed barn and is collectively read as a character-defining survivor of the former arable landscape, accessed by the historic route of Shepherd's Thorne Lane. Therefore, the impact of the Redrow proposal must be considered in the context of Section 66 of the P(LB&CA) Act 1990, NPPF paragraphs 192 and 193 and the conservation of the fabric and setting of the listed building group afforded great weight in the planning decision-making process.

The submitted 'Heritage Impact Assessment' (May 2021) notes that the setting of Shepherd's Thorn Farm has changed significantly since the middle of the C20th with the introduction of the M62, Bradley Golf Course and dwellings on the north side of Bradley Road. The extant C20th changes have, "*devalued the contribution of setting to the significance of the farmstead*" (page 19). However, it concludes that, the open agricultural land to the west of Shepherds Thorn, on which the Redrow scheme is located, "*makes a positive contribution to the setting of the farmstead, as it provides one of the few remaining links to a past rural landscape which has been largely eroded*". The heritage Impact Assessment concludes that the proposed Redrow development would reduce "*the amount of open land of a rural character within the setting of the farmstead and further devaluing the contribution of setting to its significance*". The impact on the designated heritage assets is defined as "*less than substantial*".

Similar conclusions are recorded in the Heritage Impact Assessment in terms of the impact on other nearby heritage assets: Toothill Hall, Toothill Court and gatehouse to Toothill Hall (Grade II), Bradley Villa (Non-designated) and Castle Hill and Victoria Tower (Scheduled Monument and Grade II).

Consequently, the development must be considered in the context of NPPF paragraph 196 and

Local Plan policy LP35 and weighed against the public benefits of the proposal, these are clearly defined as being the delivery of “275 (sic) *new dwellings on allocated land, which will make a significant contribution to the delivery of housing within Kirklees district*” (page 21). The benefits are defined as the construction and maintenance of these dwellings which will create jobs from the outset and throughout the lifetime of the development, while the introduction of new residents will increase demand for local and regional services. However, there is no suggestion that the development will contribute to the delivery of the local services, which is indicative of the isolated focus of the current Redrow development in its current form and the apparent disconnection from the Masterplan.

The development site itself has remained in agricultural use since at least the mid-C19th, flanked by the historic route of Shepherd’s Thorne Lane and consequently has few heritage constraints in terms of its extant landscape (as an arable field), other than the harm to setting identified by the applicants. Therefore, it is important to ensure that this particular development parcel is brought forward as an identifiable component of what will be essentially a new settlement across the HS11 area, not least to clearly demonstrate that the identified harm is balanced by deliverable public benefits.

- **Impact on Shepherd’s Thorne Lane.** The heritage Impact assessment does not consider the significance of Shepherd’s Thorne Lane as a component of the historic landscape (other than identifying it on the map regression). However, it is clear that the potential of this historic lane to contribute positively to the character and potential amenity of the Redrow housing development should be considered in the context of the wider development (i.e. HS11 allocation). The currently proposed Redrow development would transform this important site edge and north-south route, adversely impacting on the character and potential of the lane and compromising its potential as both a boundary feature and a recreational/wildlife corridor. The physical and visual relationship of the currently proposed development to the lane should be reviewed, preferably in the context of the eventual Masterplan.

The proposed site layout plan (Drg. No. BVF-16-02-3) appears to exclude Shepherd’s Thorne Lane from the development site altogether, other than clearing the established hedgerows on the western side of the lane, to accommodate boundary walls, fencing and hardstanding for the Redrow residential units which abut the lane. The result would be to transform the character of the historic lane into a narrowly enclosed corridor which would again be poorly integrated into the Redrow housing layout and fail to enhance the use of the lane as a potential recreational route, (linking the site into the wider countryside and extending across the motorway). As key north-south access across the site the relationship to the edge of the Redrow development with the historic lane should be reviewed to create a more positive relationship with the historic route, enhancing its permeability and reflecting its historic character.

The current disconnection with the indicative eastern area of the HS11 allocation site means that the proposed spinal road in the Redrow site comes to a dead end at Shepherd’s Thorne Lane. This has the potential to be a significant junction linking the cross site vehicular route to the recreational route and consequently requires detailed consideration to create a landmark node defined by its space and appropriate planting. The current Redrow scheme should be reviewed to enhance this node and achieve its potential as a local landmark.

- **Tree-lined streets.** The proposed layout appears to indicate that (in accordance with national guidance) the development would address the requirements of the adopted Kirklees Local Plan, House Builders SPD, Highway Design Guide and the NPPF and include tree-lined streets. This would be a fundamental design requirement for the eventual Masterplan and the details of the tree-lined streets, junctions and gateways should be clearly shown to demonstrate how the highway and footpaths will be enhanced by tree planting within the adopted highways.
- With regard to the Redrow site the street-tree planting should be fully detailed and include a particular focus on the gateway onto the site from Bradford Road and along Shepherd’s Thorne

Lane. The spinal road in particular should be characterised by street-trees located within the highway, leading towards the indicative node at the junction with Shepherd's Thorne lane, with appropriate species defining the street-hierarchy and defining the central public open space.

- **Design for Biodiversity Net Gain.** In accordance with the National Model Design Guide, and national and local policy, the Redrow housing layout should address the national policy expectations for all new housing development by demonstrating an accommodation for a minimum of 10% Biodiversity Net gain onsite. This would also be a fundamental requirement for the eventual Masterplan and the Redrow scheme should be designed to accommodate this minimum requirement, enhancing the greenspace connections and linking to a new corridor along Shepherd's Thorne Lane.

Given the boundaries of the site on the edge of the countryside there are also clear opportunities to connect the Redrow layout to potential wildlife corridors (which need to be defined in the eventual Masterplan). This should be a key design parameter, facilitating delivery of a high-quality development.

The opportunity should, therefore, be taken to emphasise the rural-edge character of the site, particularly with the proposed residential units facing the northwest boundary and Shepherd's Thorne Lane. This again could be achieved by lining the new roads and greenspaces with a layered tree-lined structure. The focus on a 'well-treed' development layout would help mitigate the visual impact of the transformative change (which has been identified and resulting in harm by the submission). The requirements of the adopted Kirklees Local Plan, House Builders SPD, and the NPPF should be directly addressed by amendments to the design layout and enhancement of the on-site green-infrastructure network.

- **Hard surface and frontage parking.** Parts of the streetscape on the Redrow Layout would be dominated by hard standing and frontage parking, with the terraced units having no clear access for storage space (e.g. units 35-38 and 108 – 111). These units which would have a disproportionately negative impact on the streetscape and negate the potential for coherent street-tree planting. The layout and design approach to the frontage should be reconsidered to better indicate the smaller units and enhance the green space and tree planting connections.

## Conclusion

The currently proposed Redrow housing layout would have an identified indirect adverse impact on the setting of the nearby designated heritage asset and a transformative and adverse landscape impact on the landscape. The scale of the development and its potential to contribute to the wider, neighbourhood-scale development allocated in the local plan require that the development of this component is realised in the context of a comprehensive and coherent Masterplan. Without being clearly set within the context of an adopted HS11 Masterplan the presented Redrow layout can only be read as a very large cul-de-sac with inadequate space for recreation, non-vehicle movement, open-space, biodiversity and no provision of any community services.

However, even viewed in isolation, the currently proposed Redrow development layout is considered to require significant review to address the policy requirement to deliver a high-quality, green, accessible, inclusive and safe residential development and meet thereby meet the requirements of NPPF paragraph 127 and Local Plan policies LP24 Design. Therefore, the submitted housing layout does not meet the requirements of local Plan allocation HS11 or Local Plan Policies LP5 or LP24 and is not presented or readable as a first phase of wider neighbourhood-scale development. The development should, consequently, be subject to significant review to reveal its potential and meet national and local policy requirements.