

## **Objections & Concerns**

### **1. Background**

Previous schemes submitted by the same developer for this sensitive site in 2009 and 2012 were rejected. An earlier version of the current application did not meet with the approval of the statutory consultees and attracted almost 200 objections from members of the public, but was discussed by the Strategic Planning Committee, which asked for further consultation to be undertaken.

The developers and their agents now acknowledge that there is a general presumption against new buildings in the Green Belt and this site, that of the former Castle Hill Hotel, lies in the Green Belt and within the curtilage of a Scheduled Ancient Monument and a designated local nature reserve.

### **2. Exceptional Circumstances?**

But they argue, there are exceptional circumstances for setting aside the existing regulations. As a site of local, regional and national significance which is a dominant feature in the landscape and from which panoramic views can be had, Castle Hill will always attract visitor interest. Yet, there are no visitor facilities, which might provide a better understanding of the site, no shelter from the elements, no toilet accommodation and nowhere to obtain refreshment.

Whilst all these are desirable, there is no reason why they should be located on the monument itself and no reasons, other than commercial ones why they should be on such a scale. Many similar sites operate without any facilities. Castle Hill itself continues to attract significant numbers despite the demolition of the hotel. With advances in digital technologies, there is less need to provide interpretive displays on site.

### **3. Scale of Proposed Development**

The present application is a re-working of previous submissions, although the developer's latest proposal, which is stated to be 'smaller than ... the extended scheme approved at the beginning of the century' [7.01]. Nevertheless, it covers an area greater than the footprint of the original building. The built area including terraces south-westwards towards the Victoria Tower encroaches on land outside the current lease and within the boundaries of the Scheduled Ancient Monument and north-eastwards on to the area of the former Castle Hill Hotel car park which is again within the Scheduled Ancient Monument. Furthermore, to reduce the overall height of the building with a view to reducing its impact on the landscape, considerable portions of the building are below ground necessitating deep excavation. This is justified by the findings of a somewhat limited archaeological excavation undertaken in August 2018. There is no indication that the developers have negotiated an extension of the leasehold area with the freeholder, Kirklees M.C.

Whilst the architects have sought to minimise the impact of the building on the site by the use of natural stone, traditional and more contemporary forms and by keeping the structure to a basement and two levels above ground with a low pitched roof, together with the associated service area and car parking, it occupies a considerable area of the middle ward of the monument.

Almost 90% of the floor space of the building is taken up by a restaurant / cafe and hotel accommodation. One room approximately the same size as two bedrooms, is available for interpretative displays, educational activities and events. Whilst it is understood that a commercial element is important to making the scheme economically sustainable, a room with displays is hardly 'a facility of national standing'.

#### 4. Car Parking

The site is seen as a major tourist attraction for the borough and the area, and yet the development reduces the number of car parking spaces available by 25%. There are 37 spaces. Many of the available spaces will be occupied by some of the 30 FTE employees (there are only nine spaces available in the service yard. Residents of the six double bedrooms would compete with diners in the 92 cover restaurant /cafe and those enjoying drinks on the terrace. And, we have not considered the family visitors just out to enjoy the fresh air, the views and the archaeology of the site. The developers acknowledge that at times, the hill and the access road may be congested and offer to control traffic flows up and down the hill. Might they restrict access to those attending functions at the restaurant?

#### 5. Provision of Services

The introduction and improvement of services for the new building would impact on the archaeology of the site. In their application, the developer indicates that the method of sewage disposal is 'unknown'. A single earthenware pipe leads down the side of the monument to Ashes Lane. This is scarcely adequate to deal with the waste from a large kitchen, six en-suite bedrooms and public toilet accommodation. There is no indication as to how surface water from the building or the extensive hard landscape will be handled. [Some of the better recent visitor centres harvest rainwater for flushing toilets].

There is no apparent provision in the scheme illustrated for heating the building; no plant room and no 'chimneys'. No provision appears to have been made for ventilation of the large kitchen space which occupies a basement level, requiring deep excavation.

When the previous Castle Hill Hotel was demolished and the site infilled, it is presumed that the electricity and water supply points were capped off and that they can now be re-instated. Are they adequate for the needs of the new proposed development? It is more than likely that the water supply is a single lead pipe once considered suitable for a domestic supply. Would excavation be necessary for the renewal of these services? Has the possible impact on the archaeology of the site been fully considered?

There is no mains gas. The kitchens of the previous hotel used bottled gas.

## 6. Completeness of Plans?

There are some inconsistencies between the plans, the 3D realisations and model of the proposals which raise a number of questions.

Are the terraces to be fenced? There is a risk of patrons falling on to the bedroom terrace. The slope to the picture window affording views of the Victoria Tower from the education room and the top lights of the same space are similar hazards.

How are the terraces to be used? Will they have tables and chairs for alfresco drinking and dining?

There appears to be only one entry/exit point to the basement kitchen. Is this safe? How will this impact on the delivery of goods and services and the removal of waste?

Already noted is the absence of ventilation to the kitchen area.

Despite this being a 24hour operation, there is no provision of staff accommodation.

It is intended that the bedrooms might also be used at breakout room when the main function room is in use for meetings. There is no obvious storage space for bedroom furniture.

There is no indication that the development will incorporate eco-friendly measures.

## 7. Light Pollution

Despite the scale of the operation and the inclusion of a six bed hotel, facilities for staff are limited and there is no staff accommodation. The application notes a 24 hour presence on site as one of its benefits for security etc. The restaurant and bar would operate until 23.00 hours. Together these would also increase light pollution on the site impacting on Castle Hill's rich and varied wildlife.

## 8. Impact on Archaeology

Construction of the proposed building would have a considerable impact on the monument as would subsequent daily deliveries and removal of waste. The road to the site is unsuitable for goods vehicles. The bedroom terraces impinge on the ramparts of the hillfort. Already noted, the provision of services would have considerable consequences for the site archaeology.

## 9. Business Model

Not discussed in the application are the operation of the facility and the business model. The large restaurant and kitchen suggest volume catering and functions rather than light refreshments for casual visitors, family groups and dog walkers. The two markets do not sit happily together and there is the possibility that booked parties will take precedence to the exclusion of the casual visitor- in effect privatising the hill.

#### 10. Access to the hill.

Access to the hill is poor. Organised functions, like conferences and weddings, would intensify traffic flows and congestion on the hill and surrounding roads. The proposal to create three passing points on the access road is unacceptable as it would involve cutting into the earthworks forming the monument.

#### 11. Restricting traffic to Castle Hill.

There is a sound case for restricting vehicular access to Castle Hill to all but the disabled. Closing the hill to traffic at night would reduce anti-social behavior. Alternative provision should be made off the hill where visitor facilities might also be provided. A piece of ground in council ownership has been identified as a possible site. This could be carefully landscaped to reduce its impact on the scenery. The most recent, successful and award-winning visitor centres have mostly been built at a distance from the attractions they serve. The centres, often screened from view but occasionally sited to give a unique view of the attraction, are linked by trails, land trains and buggy rides. Like the facility under consideration, they are not infrequently built with local materials but, through the use of eco-technological and sustainable solutions, they seek to minimise their impact on the environment.