

19/10/2020

Mr. Christopher Caroll  
Kirklees Council  
Planning Department  
Civic Centre III  
Huddersfield

Dear Chris

## **RE : 2020/91896 – PENTLANDS, NEW MILL ROAD, HOLMFIRTH, HD9 7LN**

I write to you in regards to our planning application (2020/91896) to summarize the alterations and modifications ourselves, and our consultants have made to the proposals following your email discussing your concerns over the application on the 11<sup>th</sup> of August 2020.

Below, I have discussed shown the council's concerns on the previous proposals along with how we have addressed these concerns following our, our consultants or your input.

*The proposed residential layout would result in part of the residential site allocation HS189 not being able to be developed. Within the supporting statement, reference is made to the adjacent landowner having no desire to develop their land within the site allocation. However, this does not rule out the possibility that the concerned landowner/s or a potential future purchaser may wish to develop this area of land in the future. More importantly, your proposed justification does not support a departure from Local Plan policy LP5.*

Our proposals have been amended and redesigned to take into account these comments. In line with policy LP5, we have provided access provision within our proposals as well as demonstrating how the remaining land of the allocation H189 could be developed alongside our proposals. As well as this we have also demonstrated internal turning provisions and forward visibility for this proposed access point.

*Officers consider that the proposed density of 48 dwellings per hectare would represent 'overdevelopment' and would result in adverse impacts on residential and visual amenity. The street scenes would be dominated by the parked car, with minimal soft landscape features, and no public open space for biodiversity enhancement or visual amenity. Also, there are no bin presentation points. Officers consider that the proposal would result in a residential character with a 'central urban feel' rather than a more 'spacious suburban/rural feel.' As outlined in the pre-application enquiry letter and Planning Policy response a density of around 35 dwelling per hectare would be preferred, taking into consideration site constraints, i.e. mining features, trees,*

*etc. Officers also have serious concern about the proposed relationship between the proposed development and with the existing properties known as Wynncliffe, 1C and Glenn View.*

Our development unit numbers have been reduced from 25 dwellings to 21 dwellings which reduces our site density to 38 dwellings per hectare with our site area been 0.56HA. As well as the reduction to density numbers, we have utilized the increased open spaces to increase soft landscaping areas and opted for parking to the side of dwellings where possible which as a result reduces hard landscaping areas. The proposed site plan also now clearly demonstrates bin storage and presentation points, swept path and visibility envelopes.

*The lack of any proposed soft landscaping and biodiversity enhancement measures implies that little regard has been given to the above planning policy consideration.*

The reduction to hard landscaped areas has allowed for an increase in soft landscaping and biodiversity enhancements on site. As well as this we are proposing an off-site biodiversity enhancement scheme in line with David Watts's Latest report.

*The proposed design very much appears to have been designed in isolation with little evidence provided as to how the new development will enhance the New Mill Road street scene or consider the surrounding semi-rural context, including views across the valley. The surrounding dwelling houses are 2 storeys in height, set within fairly wide and large landscape plots. In contrast all of the proposed development plots seems to ignore the surrounding existing morphology and introduce dwelling house types that are predominantly 3 storeys in height and generally set within long narrow development plots. Officers welcome the proposed housing mix and contemporary architecture but feel that more regard should be given to the existing residential built forms. Officers also have concerns regarding the steep pitched roof forms and the proposed number of roof lights.*

Design alterations have been made to the site layout to increase plot widths however, due to the proportions of the site, plot proportions vary to make sure the development is efficiently laid out. House types three and four have been omitted from the proposals as they were identified as being out of character with the area. The remaining house designs are two and a half storey and one three storey adjacent to the site entrance. These three storey triplex block provide a design feature on the entrance of the site frontage. The approved adjacent development at Mythlothian Garage has a number of two storey, three storey and four storey dwellings approved towards the new mill road boundary. We feel that our design proposals along side the existing approval will work harmoniously with the rest of New Mill Road. The site elevations also clearly show the massing of the site is not inappropriate as it is similar to surrounding massing.

Alterations to materials also reduce the impact on the street scene by omitting the Cedral cladding in lieu of Ashlar Sawn Stone.

*For the avoidance of doubt it would be helpful if you could please revise the schedule of accommodation so that it is in GIA sqm and not sqft, as well as clearly indicate as to whether or not the proposed house types would address table 1 of the Technical housing standards – nationally described space standard.*

We have reissued the amended design & access statement along with an updated schedule of accommodation in line with the latest proposals. Although some houses are slightly larger than the minimum housing sizes in the technical housing standards, we feel that this is not inappropriate in the benefit of providing high quality homes.

*The above design matters seem to have been overlooked with the latest design proposal. In particular, the proposed development would result in plots 1 to 14 turning their back onto New Mill Road which would mean these properties would not face the most important area of public realm that they abut, contrary to good design practice (see paragraph 68 of the National Design Guide) and Local Plan policy LP24 criterion e. I suggest that the proposed private access roads/driveways be relocated adjacent to New Mill Road and that the dwelling houses be redesigned to front onto this road.*

The latest proposals have plots one to thirteen facing New Mill Road and do not turn their back out of the site in line with the recommendation above.

*A boundary treatment schedule has not been provided. This should be provided to enable officers to assess all visual and amenity impacts of the proposed development holistically.*

Proposed boundary treatments are clearly highlighted and annotated in the proposed site plan and key.

*To protect residential amenity a separation distance of 21 meters is required between existing dwelling 1c and the habitable room windows of plots 21 and 22. It appears that a separation distance of only 18 meters has been proposed.*

Kirklees adopted local plan does not have any space about buildings policy nor are there are minimum distance requirements. Using the outdate and removed BE12 policy for distances in this case would not be appropriate. However, the side first floor facing windows from 1C are not primary habitable windows, they are secondary habitable windows that are screened by a retained mature tree. The windows are Ground floor will be screened by a fence as shown on the proposed site plan and further screened by the aforementioned retained tree. It is of our opinion that The proposals do not affect the residential amenity of 1C.

*Concern is expressed about the proposed relationship between plot 17 and Glenn View which has now only a separation distance of between 16m-17m. Furthermore, a greater separation distance is also required between plot 18 and Glenn View to ensure that the existing residential amenity is truly respected.*

Kirklees adopted local plan does not have any space about buildings policy nor are there are minimum distance requirements. Using the outdate and removed BE12 policy for distances in this case would not be appropriate. However, we have omitted this house type for a two and a half storey dwelling and increased the separation distance from 16 to 18.5M.

Given the above points and alterations that have been made, we would hope that the amended scheme would be deemed acceptable and would respectfully request that the proposals are progressed for an approval.

Yours Sincerely,

Jake Hinchliffe  
Director  
Orange Design Studio Limited