

01 August 2023

**Application Reference No. 2023/62/91491/W**  
**Proposed Development at Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU**  
**Impact on 29 Woodhead Road, Homefirth, HD9 2JU**

**Application Details** Erection of 61 age-restricted apartments with ancillary accommodation including separate residents lounge and manager facilities and associated external works, including the erection of access bridge and riverside walk featuring two pedestrian bridges (within a Conservation Area)

Thank you for your letter of the 20 July 2023, in response to our planning letter of the 13 July 2023. I note you commented specifically on the following two issues:

1. That the lower ground floor windows serve uninhabitable storage rooms.

We highlighted within our letter that 29 Woodhead Road is currently being renovated. Our clients have not yet commenced with the lower ground floor rooms although I'm informed that these will be used as a living areas. Our client also confirms that the sales literature for the property provided by the estate agent suggested the rooms had potential for other purposes.

2. The BRE 25° test is applied to the building outlined for the extent consent.

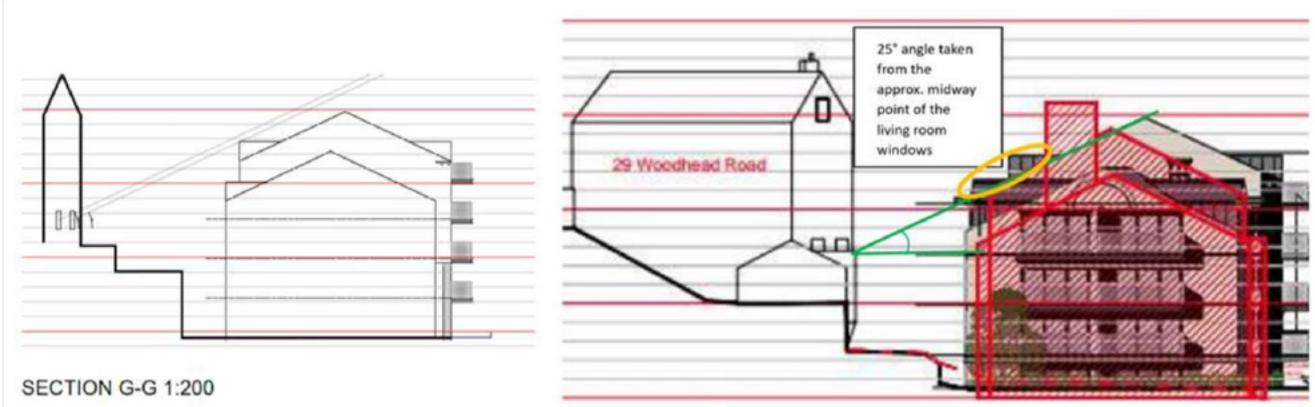
Your letter suggests we have applied the 25° test to the outline of the building that could be constructed under the extant consent outlined in red. This is incorrect. The revised proposal has reduced the impact and we have not considered the prior proposal outlined in red.

3. That the application of the BRE 25° test on section D-D does not reflect the position adjacent to our client's property.

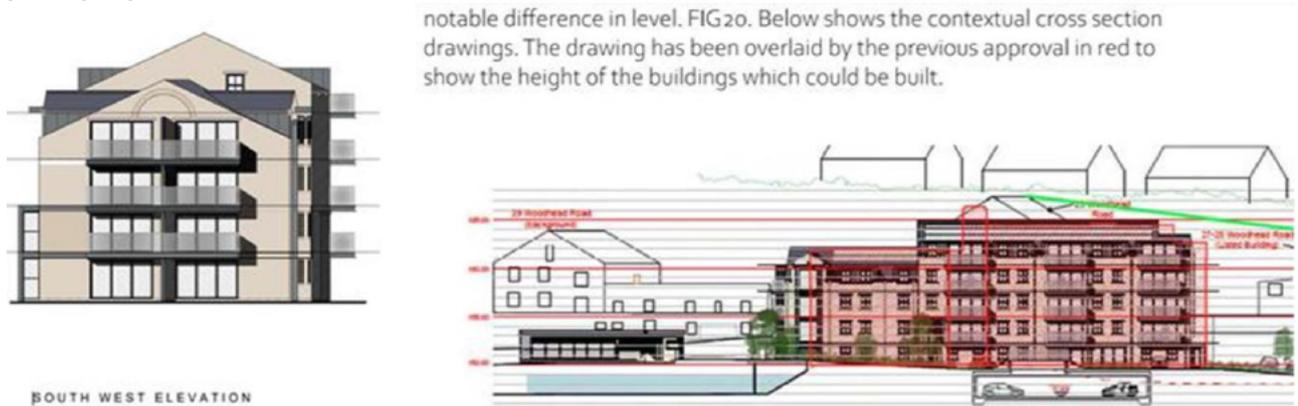
You have presented the section G-G drawing (below for reference), which indicates that the proposal satisfies the BRE 25° test. I have copied below our section D-D drawing of the 25° test alongside for comparison.

Whilst I was unable to size the two drawings for an identical comparison - nor could I locate the cross section drawing G-G produced within any of the planning documents - when looking at the heights of both sets of balconies and the corresponding cross lines, it is clear that the midway point of the windows at 29 Woodhead Road appear to line up accurately on both cross sections. The proposal breaches the 25° test in respect of the two grey roof

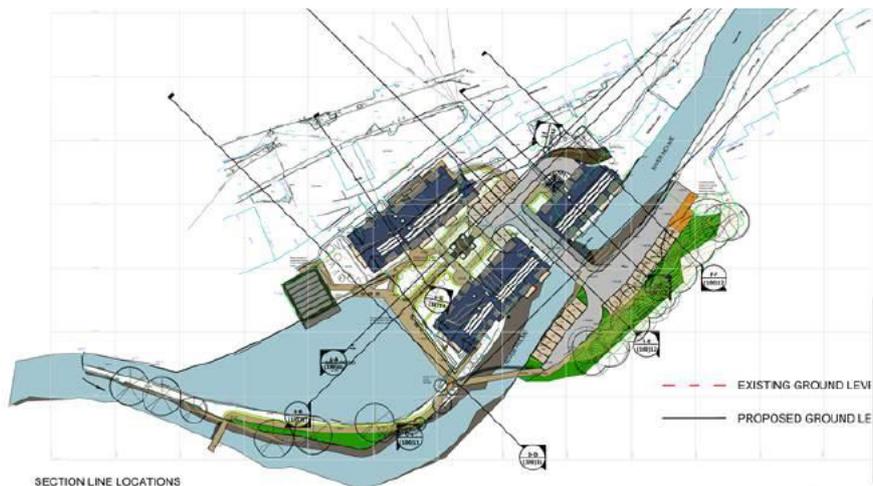
dormers above the green line. (I've circled the two areas below in yellow for your ease of reference).



The section D-D also corresponds with the contextual drawing overlaid in red to show the prior proposal.



From the section drawing key below, it would seem that drawings D-D or F-F could be used to apply the 25° test. Section G-G too, although this is a slice section through the block and does not fully represent the proposal. The BRE Guide suggests that “If ‘any part’ of the new development crosses a line drawn at 25° from the horizontal, from the centre of the window, more detailed checks are needed. In order to pass the test, the whole development must be below the 25° line, not just the part of the development which is directly perpendicular to the centre of the window.”



For the reasons detailed above, we are of the opinion that it is reasonable to apply the BRE 25° test in relation to section D-D and that we've shown the proposed development breaches this test. Consideration of the more detailed daylight and sunlight tests is therefore required.

Yours sincerely