



Date

PRICKLEDEN MILLS, HOLMFIRTH

Planning application 2023/62/91491/W

Broadly, we welcome the prospect of having more people living closer to the centre of Holmfirth. Giving residents easy access to the town centre will contribute to its vitality and viability.

We also welcome the provision of dwellings for older people. These are much needed given the local population's age profile. Enabling people to downsize will provide some flexibility in the housing market and hopefully reduce some of the demand for new builds.

Overall, the current scheme purports to contain some improvements on the previously approved scheme and we welcome them, particularly those aimed at reducing carbon emissions.

Generally, we are in favour of building on brownfield sites.

However, we do have some concerns about this particular application which mean we must lodge our objection to it:

Size - the size of the proposed complex of buildings is too large for this location both in terms of the number of units and its height.

The comments about the impact on 25 – 27 Woodhead Road are not particularly sensitive:

“Had this area to the rear always been open farmland for instance, then this proposal would cause considerable harm. However, as it stands, these cottages were part of a dense tapestry of built form on several levels with large mills in the valley bottom and smaller houses, cottages and farmsteads farther up the hill. This is the character we are dealing with here and as such we must be careful in prescribing our contemporary perceptions upon a Victorian town whose historic character was substantially different to the one we see today.”

There is no excuse for overcrowding on this scale. Just because Victorian mills towered above houses there is no justification for doing the same in the C21st century. Holmfirth is no longer crowded to the same extent and the townscape is now more open and varied.

Nature of the complex – there is a lack of affordable units. The makeup of the housing stock in the Holme Valley clearly shows a lack of apartments across a range of values. If adequate provision is to be made for all pockets, this proposal should contain more smaller units, in accordance with the Local Plan's provisions.

Appearance and impact on conservation and heritage – we welcome the efforts made so far by the developers to take account of the vernacular and apparently devise a scheme that

compliments its location. However, the size of the proposed buildings mean they would dominate the area. The scale would fit better in a more densely built environment with other buildings of a similar mass.

The design would benefit from other typical Holme Valley features, such as the use of dentiles. The use of a transparent material for the balconies rather than railings makes the building look modern rather than Victorian.

The developers would have benefited from discussions with the Holmfirth Conservation Group. The Group, which has carried out a lot of work in recent years, including a conservation appraisal of the town centre, has clear plans regarding using Holmfirth's heritage to help build its future. This work is in the public domain.

Car usage – the provision of car parking spaces encourages reliance on cars. We appreciate people still want to own their own vehicles but the complex is within walking distance of the town centre which has good public transport links. The route to the town centre is flat so is amenable for those using wheelchairs or mobility scooters. Climate change is happening so we must take positive steps to reduce carbon emission as much as possible. Discouraging people from using their cars is one step towards achieving this goal

The additional traffic load on Hollowgate and Lower Mill Fold is a cause for concern. The Town Centre Access Plan will improve the flow of vehicles on Hollowgate but increasing domestic and delivery traffic to this complex will put an addition burden on the road system.

The additional vehicles will have an impact on existing residents on Lower Mill Fold who already find it difficult to navigating back and forth in front of their homes. Currently residents' children are able to play outside their houses. Will they continue to be able to do so?

Does every unit in the complex really need parking for 1.2 cars? The number of car parking spaces could be reduced to encourage people to use other ways of getting about. As well as the benefit reduced car usage will have on the environment, businesses and residents, walking has health benefits and increases opportunities for social interaction.

We note no mention is made of the previously agreed S106 funding for a pedestrian crossing on Huddersfield Road near its junction with Hollowgate by the Toll Bridge. If residents are to be encouraged to walk to the town centre, as is claimed, this safety measure should be included in the conditions.

Car parking - the land allocated for cars could have better uses, such as more social space or potentially more housing.

Carbon emission reduction – there is no carbon assessment and despite the requirement to do so, no solar panels are being installed.

Drainage - it should go without saying that, given the proximity to the river, all drainage should be sustainable.

The Holme Valley is noted for its rain fall and with climate change now happening forecasting tools are no longer reliable. The Drainage Strategy accepts there will be some run-off into the River. This should be minimised. All reasonable measures should be taken to reduce water going into the drains, thus minimising the chances of them being overloaded and reduce the risk of flooding and pollution. For example there is no reason to use block paving anywhere on this site; permeable alternatives are available.

The flood risk mitigation measures are inadequate, particularly regarding the dangers presented by the underground car park.

Measures should be included in the scheme's design to encourage the reduction in water use for example a system for the use of grey water.

We note the proposals in the Drainage Strategy and urge the Committee to make sure these are protected and if possible enhanced by the use of appropriate conditions.

We are also concerned about foul sewage. A lot of houses have been built in the Valley since the sewage system was constructed and the lack of records, as noted in the Drainage Strategy, is worrying to say the least. The focus of the Strategy is on the drains in the site. It does not refer to the additional load on the system as a whole or whether there is sufficient capacity in the Brockholes Sewerage Works. Disposal of human waste does not get sufficient attention, yet the health risks of inadequate drains are real and present. The impact of adding, potentially, over more 100 residents to the town centre sewage system should be considered in far more detail than that currently provided.

Biodiversity – The application contains assessments of the potential impact on the environment and biodiversity. At the moment, the site provides an area of 'wild' land which, over the years it has been empty, has allowed an increase in the wild life population and the creation of a buffer zone.

There are specific parts of this proposal which raise major concerns.

- The proposed walkway over the mill pond is likely to have an impact on wild life in and around this area.
- Lowering the level of the mill pond is likely to have a knock on effect on other parts of the river network.
- The siting buildings so close to the river's edge, without the recommended buffer zone, will affect the river, its flow and the overall environment.

We understand the conflict between developing an empty site and preserving biodiversity but we believe the applicant should provide more information about the likely impact and could do more to mitigate the adverse effects this proposal will have on the flora and fauna.

Riverside walk – the prospect of developing the Riverside Walk is more real now than ever before. The Holmfirth Blueprint will make possible some of the ideas we have been discussing for some years. The Design and Access Statement refers to the work of the Holmfirth Civic Society. This has since been augmented by that of River Holme Connections and the Holmfirth Blueprint.

The path alongside Prickleden Mills is a key part of these plans as it gives foot and cycle access to land close to Perseverance Place which could be used for out-of-town car parking as well as extending the walk to the River's source.

The design of the proposal could easily create the impression of the complex being private land so discourage people from using the pathway. Ideally, this should be made a bridle path giving public rights of way access to walkers, cyclists and horse riders, in accordance with Kirklees' Local Plan. This pathway is critical if the full potential of the Riverside Way is realised and the strategic plan for the town centre delivered. It should be protected at all costs.

Footbridges – the proposed bridges are too narrow. To achieve the above objectives, the bridges must be of adequate width to allow easy passage for two people with bikes,

pushchairs, shopping etc as well as those using wheelchairs, mobility scooters, and by those with impaired hearing and sight.

Security measures – the complex will, in effect, be a locked enclave. We understand residents' wish to be safe but the Crime Statement reports the very low levels of crime in Holmfirth. The provision of unnecessary safety measures is known to increase the perception of criminality. Therefore there is the very real chance the fear of crime will outweigh its reality. Moreover, putting a gated, fenced and locked development in such a highly visible spot will send negative messages to those outside the complex. The overall impression on passersby should be considered and excessive and unnecessary security measures taken out of the proposals.

The public benefits outlined in the Conservation and Heritage Assessment will only be realised if the pathway is made fully accessible and the hardstanding softened. The excessive security measures could lead to the complex appearing like a tower block prison for older people not a safe and welcoming place.

Community engagement – the community engagement has been non-existent. Other than the statutory minimum, no contact has been made with the people who live close to the site and will be directly impacted by it. Some of the comments show a lack of sensitivity to the impact the proposals will have on local people.

No contact has been made with local groups. There is considerable expertise locally. Local people have invested heavily in preserving and promoting the town centre over a number of years. As well as the Conservation Group's work, River Holme Connections know a lot about the River. Its members are working very hard to safeguard the biodiversity of the water and river environs and increase assess. Neither of these nor the other community groups working with the Council on the Holmfirth Blueprint are hidden from view. There is no reason at all why the developers should not have contacted them. So far this has not happened.

Impact on Town Centre Access Plan – work is due to start on the remodelling of Hollowgate and other adjacent parts of the town centre. The businesses and residents most affected are already worried about the impact the construction work and associated vehicle movement will have on them. Adding more construction vehicles at this time will make matters far worse. What mitigation measures are going to be put in place?

We hope these comments will help the Planning Committee in its consideration of this application.

Yours sincerely

For Holme Valley Vision Network.