

HG/JC/2659

5th October 2023

Kirklees Council
Development Management
PO Box B93
Huddersfield
HD1 2JR

Dear Mr Hirst

2023/91491: Proposed Development at Prickleden Mills, Woodhead Road, Holmfirth

Further to our meeting on Thursday 17th August, please see attached an amended set of drawings, incorporating many of your comments and hopefully addressing your concerns.

In summary the changes are:

- The omission of the metal strip that ran around the building at first floor level to 'de-clutter' the visual appearance of the buildings.
- All windows have been changed from sash to casement to match the previously approved scheme.
- The loading bay features have been removed from all blocks, along with the loading bay gables to further reduce the visual impact of the scheme.
- The dormer windows have been removed from the rear of blocks D and replaced with conservation area roof lights.
- The rear access gantry to block D has been removed at all levels, reducing the cluttered appearance of the building, and further reducing any visual impact on the near-by listed buildings and the view of the building from Woodhead Road.
- Omission of fire tender access from Woodhead Road. Fire tenders will access the site from the main entrance across the river.
- Blocks C and D have been re-configured to create a larger mix of unit sizes. There will now be:
 - 3 x 1 bed apartments,
 - 49 x 2 bed apartments, and
 - 9 x 3 bed apartments.
- All blocks have been drawn in the same style as the previously approved scheme (removed shadows etc) to allow for a fair comparison.

The current scheme now looks to be similar to the previously approved scheme, and as we explained when we met, the massing of the scheme is also similar to the previously approved scheme. Below is a comparison of the height of the proposed development against the previously approved scheme. This shows that the highest point of the proposed development is lower than the highest point of the previously approved scheme. That doesn't include the lift shafts that were even higher. The other blocks are all less than 40cm higher than the approved scheme, which we doubt would be noticeable by the naked eye.

Height comparisons

Block	Approved Ridge Height	Approved lift tower Height	Proposed Ridge height	Ridge Height difference	
Block A	164.5		164.85	+350	mm
Block B	167.7	167.75	167.53	-170	mm
Block C	162.1		162.18	+80	mm
Block D	164.5	165.8	164.85	+350	mm
Block E	161.7		162.08	+380	mm

Whilst we doubt the differences in heights would be noticeable, we are concerned that it seems as though the previously approved scheme is at the limit of what could and should be accommodated on the site. However, it does not appear there was any discussion, negotiation or concerns raised about massing and scale of the previously approved scheme. English Heritage simply raised concerns about the colour of the parking bays and the officers report explained that in terms of Conservation and Design there was *"No objection and consider the proposal would comply with the guidance in the NPPF"*.

In the detailed assessment, the officers report focuses in more depth on the loss of the existing buildings and counters this with the public benefits of the approved scheme. There is no comment on the scale of the approved scheme except that the report states *"there is no doubt that the site can cope with a variety of heights and scale in building form, despite the fact that the existing buildings are of a relatively low scale. K.C. Conservation & Design is of the opinion that the low scale of the existing buildings is in deference to the larger woollen mill to the east and part of their function at the time"*. There is nothing to suggest that buildings that in some part would be slightly higher would be unacceptable.

The proposed scheme has no balconies, gantries or any other projections on block C and D facing Woodhead Road. The only projections on the buildings that would be visible from Woodhead Road will be the balconies on the west facing elevations. We believe the design of these balconies means they would be far less prominent than the west facing balconies on the previously approved scheme. The section below shows the view from Woodhead Road, and how the proposed development is clearly not a dominant feature when seen from Woodhead Road.

Section – Proposed development viewed for Woodhead Road



Previously approved scheme – western elevations



Proposed scheme - western elevations



Notwithstanding the changes listed above we also think it is important to consider the benefits of this scheme over and above the previously approved scheme. We note the comments you made at the meeting that some of these aspects are now required as planning policy has changed, however this should not detract from the fact that this scheme will deliver these items which wouldn't be delivered if the previously approved scheme was built and therefore they should be material to the decision-making

process. The previously approved scheme is a genuine fall-back position that would not deliver the benefits listed below.

Benefits of the proposed scheme against previously approved scheme

Item	Approved Scheme	Proposed Scheme
Loss of Flood Plane	No Mitigation	100% mitigation by lowering the level of the Mill Pond
Material brought in to build up land	3400 cubic meters of material needed to build up ground to infill flood plane to ground floor level. (170 x 20-ton truck loads on local roads)	None as lower ground level used for undercroft car parking
Car parking spaces between blocks	28 surface spaces making area between blocks nearly all car park. Providing poor visual amenity to residents of scheme & Residents on Woodhead Road overlooking the scheme	9 surface spaces making area between blocks nearly all open space. Providing good visual amenity to residents of scheme & Residents on Woodhead Road overlooking the scheme
Public footway along River Holme	One footbridge which requires public to deviate on road through car park	Two footbridges which allows public to walk on footpath along the riverbank avoiding the car park This is more direct without the need for public to walk through the site between the buildings.
Number & size of Apartments	46 Apartments average 74.3m ² (10 x 1 Bed & 36 x 2 Bed)	61 Apartments average 93.7m ² (3 x 1 Bed, 47 x 2 Bed & 9 x 3 Bed)
Highest ridge on scheme	167.75 AOD	167.53 AOD (170mm lower)
Solar panels	None	Solar panels on all south facing roofs of all blocks (more than basic requirement)
Air Source Heat Pump heating	None	To work with solar panels to heat all apartments (more than basic requirement) (We think will be close to Carbon Neutral heating)
Residents Lounge	None	Included
Car Parking Spaces	51 spaces (excluding four existing) That is 1.1 spaces per apartment. Of those 6 are Accessible (11.8%)	74 spaces (excluding four existing) That is 1.2 spaces per apartment. Of those 14 are Accessible (18.9%)
Electric car charging points	None	One per apartment (will run off Solar Panels in summer when not needed for heating)
Cycle storage	None	Included

Resident storage room	10 in total shared	61 in total. One per apartment.
Lowered Mill Pond surface level	None	Lower Mill Pond will allow habitat on banks for a variety of wildlife
Ecology	None	Landscape and Ecological Management Plan bring about enhancements, lower level of Mill Pond to provide additional habitats for insects and wildlife, and Biodiversity Net Gain
Leisure and Opportunities for Healthy Lifestyles	None	The proposed development includes storage under the residents lounge for equipment such as paddle boards and rowing boats that can be used by residents

We hope the changes that we have made now allow you to support this scheme, but we are more than happy to meet with you and Sebastian to run through the amendments in more detail.

Yours sincerely

Hamish Gledhill BSc (Hons), Dip TP, MRTPI

