

**From:**  
**To:** [Mathias Franklin](#)  
**Cc:** [DCAdmin](#)  
**Subject:** Prickleden Mill- Planning Submission ref: 2023/91491 - Letter of Objection  
**Date:** 12 July 2023 20:31:19  
**Attachments:** [Prickleden Objection letter110723.docx](#)  
[Prickleden Mill Accommodation Schedule 2023.xlsx](#)

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Dear Mathias Franklin

Thank you for your notification letter 19/06/23 regarding these revised proposals. Please find attached:

1. A letter setting out reasons for refusal and a formal objection to the proposals.
2. A schedule quantifying the scale and massing of the proposals in comparison with the consented scheme.
3. A photograph of Prickleden Mill from 1903
4. A photograph of the site taken in 1937.
5. Area Schedule from consented scheme

Items 2-5 are referenced in the letter of objection.

Regards

25 Woodhead Road  
Holmfirth  
HD9 2JU

Mathias Franklin  
Head of Planning and Development  
Kirklees Council  
BY e-mail:

25 Woodhead Road  
Holmfirth  
HD9 2JU

11/07/23

Dear Mathias Franklin

We are writing to object to the planning application lodged at **Prickleden Mills ref:2023/91491**

1. Kirklees Councillors and officers rightly refused application number 2021/62/92003/W from the same applicant and their design team. The five reasons for refusal of that application have not been addressed by this submission, and all remain applicable, and should be cited as reasons for refusing this application. The lack of considered and meaningful changes to the design to address the reasons for the refusal, is well illustrated by extensive usage of the same drawings, which still bear the 2021 dates they bore when submitted in support of the refused application.
2. Its immense scale and massing will cause significant harm to the Conservation Area in Contravention of the National Planning Policy Framework paras 189-200. This scheme is some 77% bigger(see attached accommodation schedule comparison) in terms of its volume/scale and massing than the previously consented scheme(2012/90738) . The previous scheme comprised 13 x 1b and 33 x2b with a Net Internal Area (NIA)of 34,812 sq.ft (125 habitable rooms). This scheme is 59x 2b and 2x3b with a NIA Of 61,570 sq.ft (185 habitable rooms). Its scale is larger than those homes in Lower Mill Road and anything else in proximity to the centre of Holmfirth.  
The statement at 3.4, page 3 of the Planning Statement that ‘the bulk and massing of the proposed scheme is in line with the previously approved scheme’ is **false**.
3. Its immense scale and massing will cause harm to the setting of the grade 2 Listed Buildings at 25 and 27 Woodhead Road in contravention of National Policy and also Kirklees policy LP35 which states that development proposals affecting a designated heritage asset should preserve or enhance the significance of the asset.
4. The scale and massing bears no relation to the historic Prickleden Mill which was originally a 2 and 3 storey structure as is evidenced on the attached photograph from 1903. It also occupied far less of the site than the proposals which are being put forward.

5. The eaves height of the revised proposal in places is up to 170m AOD making it in places 3 storeys higher than the consented scheme. . Some of the buildings proposed will exceed the height of the Listed Buildings at 25-27 Woodhead Road which will be dwarfed and obscured by these revised proposals in further offence to policy LP35.
6. The existing ground level is proposed to be raised by up to 3m to accommodate underground car parking . Aside from exacerbating the problems of height, scale and massing of the proposals, this is in contradiction to policy LP20 for Sustainable Travel with its prioritisation of private vehicles in direct contravention of the policies set out in the hierarchy in the policy itself.
7. The proposal contravenes and is therefore in breach of policy LP21 , Highways and Access. The Transport plan(and the application in general) do not demonstrate how they will promote National and Regional policies to promote sustainable development. Specifically it fails to demonstrate how the proposals will provide opportunities to promote the use of walking, cycling and public transport.
8. The proposal has failed to have proper regard and is therefore in contravention of policy LP22 'Parking' by giving limited consideration to alternative means of transport, and introducing such measures as a 'Car Club'. The single over large cycle store , remote from most of the dwellings should be rethought so that smaller storage provision with easier access for individual blocks are provided to encourage cycle use. This could be in lieu of a number of the parking spaces.
9. The design of the scheme is in breach of policy LP24 'Design'.
  - (a) It does not enhance the character of the townscape, heritage assets or landscape.
  - (b) It does not promote high levels of sustainability
  - (c) It does not promote the needs of a range of different users.
  - (d) It does not demonstrate how it contributes towards enhancement of the natural environment, support biodiversity, and connect to and enhances ecological networks and green infrastructure. The developer should formulate plans during construction and post completion for opportunities for the preservation and enhancement of this wildlife.
10. The proposal may be in breach of policy LP28 Drainage. The developer should be required to demonstrate outline proposals on how SuDS will be implemented , and should not be permitted to raise the Ground levels and especially not by the enormous amounts shown in the plans.
11. The Developer has not provided a Daylight and Sunlight Assessment in accordance with the BRE methodology showing the impact of the proposals on existing dwellings , and in particular 23, 25,27 and 29 Woodhead Road which are those most affected. Please can you require them to do so.
12. Given their age it is highly likely that a number of existing adjacent buildings in Woodhead Road, have prescribed Rights of Light, which is a material planning consideration. Please can you require the developer to carry out the requisite surveys with suitably qualified surveyors to evidence the position.

13. The 1937 photograph of Prickleden Mill (attached) clearly shows the view of the Listed Buildings and Conservation Area from somewhere along Cemetery Road. These views of the Listed and historic buildings , in particular 23-29 Woodhead Road will be obliterated by the enormous scale and massing being proposed. The CGIs previously submitted conspicuously failed to show the proposal in the context of the Conservation Area, Listed and historic buildings. The developers should be directed to produce a scale model, some images and drawings(particularly elevations) showing their proposals in context and comparison with these buildings. These could have been used in the Visual Impact Assessment , but they have chosen not to do so.
  
14. The Developer's Heritage and Visual Impact Assessment presents a partisan and selective opinion of the case for the scale and massing being proposed. A number of highly speculative opinions (unsubstantiated by evidence) as to the scale and massing of the original Prickleden Mill are expressed. Conspicuously the assessment has failed to cite or examine the very substantive evidence, easily available online, represented by the photograph of Prickleden Mill dated 1903. This shows that the Mill buildings were predominantly two storey, with the building in front of the Mill Pond a three storey structure(proposed as six here by the developer). The photograph refutes the speculations in the statement that any part of Prickleden Mill was higher. The photograph taken from the Southern side of the River Holme, clearly illustrates that 23-29 Woodhead Road were all visible historically from this view point. A copy of the photograph accompanies this letter.
  
15. The Visual Impact Assessment does not contain verified views. It qualifies itself by saying the ridge heights are 'approximate'. It does not show the proposed buildings (easily done with today's CAD and photoshop programmes) in the images. Please ask the developer to resubmit it with the proposed buildings inserted into the photographs. Otherwise it has very limited value.
  
16. The conclusions as to the impacts from many of the views are absurd.
  - (i) Viewpoint 1 – The conclusion that the impact from this viewpoint is 'low or negligible' makes the case as to why the photographs should illustrate the buildings in them.
  - (ii) Viewpoint 7 – The current expansive view enjoyed by the public up the Holme Valley to Holme Moss is well illustrated by this photograph. The development will obliterate it. To classify its impact as Low/Medium is ridiculous
  - (iii) Viewpoint 10-The current expansive view enjoyed by the public up the Holme Valley to Holme Moss is illustrated by this photograph. The development will obliterate it. To classify its impact as Low is also ridiculous.
  - (iv) Viewpoint 12- This illustrates that 23-29 Woodhead Road(Listed and historic buildings) are easily viewable in their historic context from Cemetery Road, a view that will be obliterated by the development. Again the assessment of 'Low' for the impact of this draws into question the judgement of the author.

All viewpoint photographs feature trees in full leaf, which is clearly approximately half the year at most . In Autumn, Winter and early Spring the development will be even more intrusive.

17. The Mill at Lower Mill Lane was far more substantial than the historic buildings of Prickleden Mill . The new buildings proposed will substantially exceed the Lower Mill buildings in scale and massing. The Heritage statement seeks to imply that Prickleden Mill was at the same scale as the now tallest building (which had a storey added when converted to residential) as Lower Mill Lane.
18. The scheme offers few different flat typologies to cater for a range of households as required by policy and no affordable housing.
19. At 5.20 of the Planning Statement, the Developer quotes paragraph 130 of the NPPF as to what a development should include. On at least 5 of the 6 points quoted, the development fails. It is particularly striking that far from providing public space and being inclusive and accessible, the development seeks to turn its back on and exclude the existing community, by being lock- gated at all access points.
20. It creates a very insular and inward looking gated development. Whereas the river walkway route on the consented scheme went through the development, this seeks to route it entirely outside, and there are gates preventing any public pedestrian access across the site. The work to the Mill Dam (restyled as 'Prickleden Lake' in their advertising webpage <https://www.elistonhomes.co.uk/>) is to create an amenity facility for the exclusive use of the 'luxury development'.
21. It seeks to represent as public and community contributions design features that are wholly for the benefit of the new scheme and its saleability. There is even less public benefit arising from the scheme than on the refused application.

Consistent with their previous application, the Developer has not sought in any way to engage with the local community in respect of the proposals. They have not convened a public meeting/exhibition with drawings/models at an appropriate scale to show their proposals.

They have not produced a Statement of Community Involvement to ensure that there has been proper consultation with local residents, amenity groups and local political representatives. Please can you request them to do so.

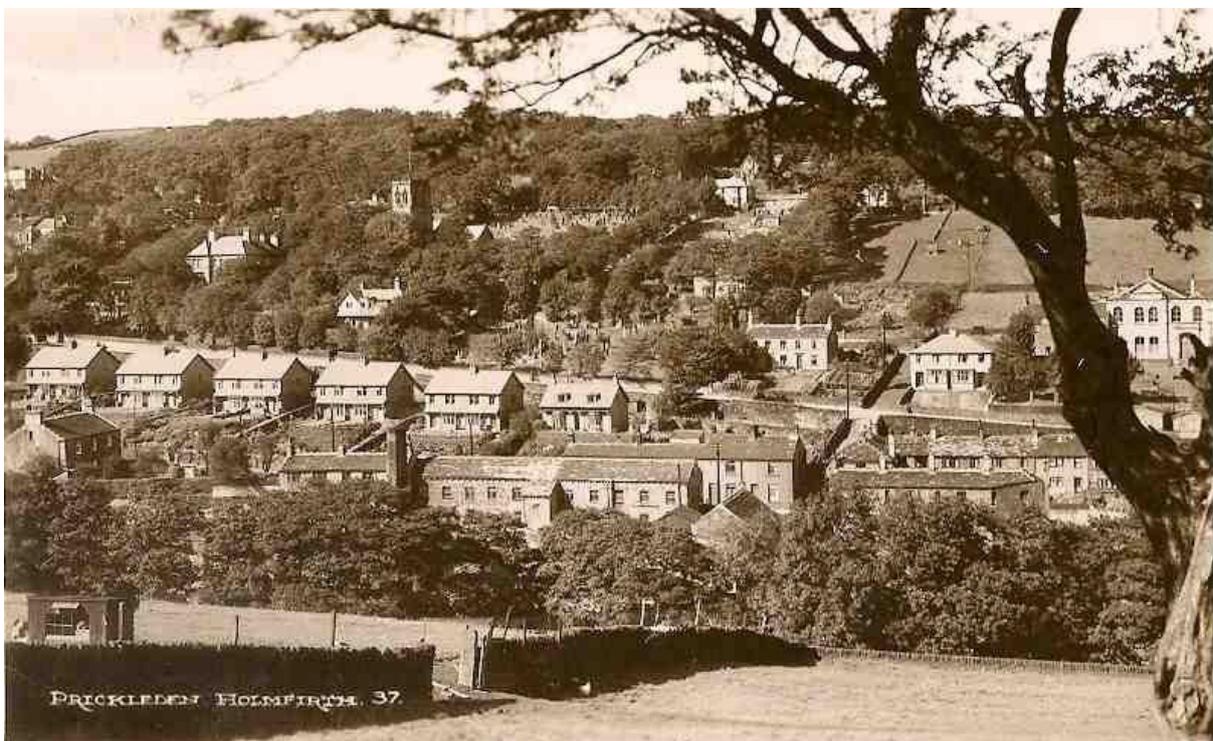
Please keep me informed as to your assessment of this proposal which is clearly in multiple breaches of planning policies, and very similar to the previous application which you rightly refused. I hope you will come to the same conclusion in respect of this proposal.

Yours sincerely

A photograph of Prickleden Mill from 1903



A photograph of the site taken in 1937.



A schedule quantifying the scale and massing of the proposals in comparison with the consented scheme.

**A+DP**

client: Conroy Brook Developments date: 07.03.12 project no: 10040  
 project: Prickleden Mills, Holmfirth doc nr: 10.00 page no: 1 of 1

**Draft Area Schedule - Net Internal Area - as Sketch Series 100 P05**

Apartment nr.	Area (sq.m)	Area (sq.ft)	Location	Beds	Drp Ref	Car Spaces	Balcony (sq.m)	Juliet Balcony
Apartment 1	61.91	668.40	Block A - Level 0 1		Apt 1	1.0 Spaces	6.25	✓
Apartment 2	66.78	718.82	Block A - Level 0 2		Apt 2	1.5 Spaces	6.25	✓
Apartment 3	64.77	697.18	Block A - Level 0 1		Apt 3	1.0 Spaces	6.25	✓
Apartment 4	66.78	718.82	Block A - Level 1 2		Apt 4	1.5 Spaces	6.25	✓
Apartment 5	66.78	718.82	Block A - Level 1 2		Apt 5	1.5 Spaces	6.25	✓
Apartment 6	64.77	697.18	Block A - Level 1 1		Apt 6	1.0 Spaces	6.25	✓
Apartment 7	66.78	718.82	Block A - Level 2 2		Apt 7	1.5 Spaces	6.25	✓
Apartment 8	66.78	718.82	Block A - Level 2 2		Apt 8	1.5 Spaces	6.25	✓
Apartment 9	64.77	697.18	Block A - Level 2 1		Apt 9	1.0 Spaces	6.25	✓
Apartment 10	66.78	718.82	Block A - Level 3 2		Apt 10	1.5 Spaces	6.25	✓
Apartment 11	66.78	718.82	Block A - Level 3 2		Apt 11	1.5 Spaces	6.25	✓
Apartment 12	64.77	697.18	Block A - Level 3 1		Apt 12	1.0 Spaces	6.25	✓
Apartment 13	79.44	855.09	Block B - Level 1 2		Apt 13	1.5 Spaces	6.25	
Apartment 14	79.44	855.09	Block B - Level 1 2		Apt 14	1.5 Spaces	6.25	
Apartment 15	79.44	855.09	Block B - Level 2 2		Apt 15	1.5 Spaces	6.25	
Apartment 16	79.44	855.09	Block B - Level 2 2		Apt 16	1.5 Spaces	6.25	
Apartment 17	79.44	855.09	Block B - Level 3 2		Apt 17	1.5 Spaces	6.25	
Apartment 18	79.44	855.09	Block B - Level 3 2		Apt 18	1.5 Spaces	6.25	
Apartment 19	79.44	855.09	Block B - Level 4 2		Apt 19	1.5 Spaces	6.25	
Apartment 20	79.44	855.09	Block B - Level 4 2		Apt 20	1.5 Spaces	6.25	
Apartment 21	99.96	1,075.97	Block B - Level 2		Apt 21	1.5 Spaces	6.25	
Apartment 22	79.44	855.09	Block C - Level 1 2		Apt 22	1.5 Spaces	6.25	
Apartment 23	79.44	855.09	Block C - Level 1 2		Apt 23	1.5 Spaces	6.25	
Apartment 24	79.44	855.09	Block C - Level 2 2		Apt 24	1.5 Spaces	6.25	
Apartment 25	79.44	855.09	Block C - Level 2 2		Apt 25	1.5 Spaces	6.25	
Apartment 26	99.96	1,075.97	Block C - Level 2		Apt 26	1.5 Spaces	6.25	
Apartment 27	63.88	687.64	Block D - Level 0 1		Apt 27	1.0 Spaces	-	
Apartment 28	63.83	684.91	Block D - Level 0 1		Apt 28	1.0 Spaces	-	
Apartment 29	66.78	718.82	Block D - Level 1 2		Apt 29	1.5 Spaces	6.25	
Apartment 30	66.78	718.82	Block D - Level 1 2		Apt 30	1.5 Spaces	6.25	
Apartment 31	64.77	697.18	Block D - Level 1 1		Apt 31	1.0 Spaces	6.25	
Apartment 32	66.78	718.82	Block D - Level 2 2		Apt 32	1.5 Spaces	6.25	
Apartment 33	66.78	718.82	Block D - Level 2 2		Apt 33	1.5 Spaces	6.25	
Apartment 34	64.77	697.18	Block D - Level 2 1		Apt 34	1.0 Spaces	6.25	
Apartment 35	66.78	718.82	Block D - Level 3 2		Apt 35	1.5 Spaces	6.25	
Apartment 36	66.78	718.82	Block D - Level 3 2		Apt 36	1.5 Spaces	6.25	
Apartment 37	64.77	697.18	Block D - Level 3 1		Apt 37	1.0 Spaces	6.25	
Apartment 38	68.11	733.14	Block E - Level 0 2		Apt 38	1.5 Spaces	6.38	
Apartment 39	53.78	578.89	Block E - Level 0 1		Apt 39	1.0 Spaces	6.25	
Apartment 40	68.11	733.14	Block E - Level 0 2		Apt 40	1.5 Spaces	6.38	
Apartment 41	68.11	733.14	Block E - Level 1 2		Apt 41	1.5 Spaces	6.38	
Apartment 42	53.78	578.89	Block E - Level 1 1		Apt 42	1.0 Spaces	6.25	
Apartment 43	68.11	733.14	Block E - Level 1 2		Apt 43	1.5 Spaces	6.38	
Apartment 44	68.11	733.14	Block E - Level 2 2		Apt 44	1.5 Spaces	6.38	
Apartment 45	53.78	578.89	Block E - Level 2 1		Apt 45	1.0 Spaces	6.25	
Apartment 46	68.11	733.14	Block E - Level 2 2		Apt 46	1.5 Spaces	6.38	

**3,234.15 34,812.42 net lettable**

Guest room 1	20.74	223.25	Block A - Level 4 1	GR1	Visitor Space
Guest room 2	20.74	223.25	Block A - Level 4 1	GR2	Visitor Space
Community Room	59.55	641.03	N/A	Com1	N/A
Managers Office	19.63	211.30	N/A	MO	N/A

**48+Com1 No**

Resident Parking 82 No Spaces      62 No Spaces  
 Visitor Parking say 12 No Spaces      12 No Spaces  
**Total 66 No Spaces**

All figures are to be verified at the detail design stage

**Prickleden Mills June 2023**

**Accommodation Schedule**

Total Units (Resi)    Total m2

Unit Type	Bed rooms	Persons	Hab Rooms	Unit NIA (sqm)	Unit NIA (ft sq)	Circ.(sqm) (est15%)	GIA (sqm)	Unit Type Numbers	Total NIA ft 2)	Total m2	Total Habitable Rms
Smallest 2 bed-v1	2	3	3	76.5	823.4	11.475	88.0	2	1646.7	176.0	6
Smaller 2 bed -v2	2	4	3	81.6	878.3	12.24	93.8	3	2634.8	281.5	9
Medium 2 bed-v3	2	4	3	85.1	915.9	12.765	97.9	4	3663.7	391.5	12
Medium 2 bed-v4	2	4	3	90.5	974.1	13.575	104.1	5	4870.3	520.4	15
Large 2 bed -v5	2	4	3	91.9	989.1	13.785	105.7	1	989.1	105.7	3
Large 2 bed -v6	2	4	3	92.4	994.5	13.86	106.3	5	4972.5	531.3	15
Larger 2 bed-v7	2	4	3	94	1011.7	14.1	108.1	12	12140.7	1297.2	36
Grander 2 bed-v8	2	4	3	96.5	1038.6	14.475	111.0	17	17656.7	1886.6	51
Grander 2 bed-v9	2	4	3	98.2	1056.9	14.73	112.9	4	4227.7	451.7	12
Largest 2 bed -v10	2	4	3	100.2	1078.5	15.03	115.2	4	4313.8	460.9	12
Grandest 2bed -v11	2	4	3	104	1119.4	15.6	119.6	2	2238.7	239.2	6
Smaller 3 bed	3	5	4	96.8	1041.9	14.52	111.3	1	1041.9	111.3	4
Larger 3 bed	3	5	4	109	1173.2	16.35	125.4	1	1173.2	125.4	4
<b>Total</b>		<b>121</b>	<b>100</b>			<b>30</b>		<b>61</b>	<b>61570</b>	<b>6578.6</b>	<b>185</b>
Consented Scheme(Ref:2012/90738) -2013								46	34812		
<b>Increase in Scheme Mass M2</b>									<b>26758</b>		
<b>Increase in Scheme Mass %</b>									<b>77%</b>		

Prickleden Mills - Comparison Applications	Number of Homes	Net Lettable Area (sq ft)	Total (Habitable) Rooms			
Application 2023/91491	61	61570	185	30	136	61570
Consented Scheme(Ref:2012/90738) -2013	46	34812	125		46	34812
<b>Increase in Scheme Mass ft2</b>		<b>26758</b>				<b>26758</b>
<b>Increase in Scheme Mass %</b>		<b>77%</b>				<b>77%</b>