

Dear Mathias Franklin. Re: Application Number 2023/91491: Erection of 61 age-restricted apartments. Prickleden Mills. I am again writing to strongly object to the Planning Application lodged in regard to the above. The content of my objection is much the same as the previous objection (2021). The reason being, nothing has changed on the proposed site, other than some of the wildlife has finally returned after the land was ploughed over and their habitat ripped up, and 3 unsightly portacabins which are never used appeared. We own Strawmerchant's House 39, Woodhead Rd, HD9 2JU and will be directly and adversely affected by the proposal. The proposal is not acceptable in regard to Material Planning Considerations. I have cross referenced the following policies to substantiate my opposition: Kirklees Local Plan (27.02.2019) National Planning Policy Framework (02.2019) In addition, I have numerous correspondences from the previous owner of our property (now deceased) from earlier planning applications (See attached) which remain relevant to this proposal. 1) Drainage: Local Policy (LP) 28 (Contravened) Sewerage: I refer to the Consultation Response from Yorkshire Water (YW) dated 14.06.2021. It states, "We will not accept any inspection chambers on the sewers to be built on". The "Resident's Lounge" or "Village Hall" as it is referred to in the submitted Heritage Report is proposed to be built on top of or within the 3mtr boundary of one of these inspection chambers. This is the same inspection chamber that had to be opened up to clear a significant blockage earlier this year, which resulted in fowl waste overflowing on to the surrounding land around the manhole. A second manhole (directly under the proposed buildings) also needed to be opened to flush the blockage through. Yorkshire Water were unaware at the time that these manholes existed (not unusual in an area as old as Holmfirth). I suspect there may be more in the area of the proposed site that do not show on YW maps as these two did not until a problem arose. A previous letter from YW dated 17.01.2008 (attached) states "No building within 3mtrs, nor trees planted within 5mtrs of these public sewers is acceptable. It goes on to say, "It may not be acceptable to raise or lower ground levels over the sewers, nor to restrict access to the manholes on the sewers". It then states "The local Waste Water Treatment Works (WWTW) is Neily. It is understood that this WWTW may only have spare capacity, if any". This was based on a proposal of 46 apartments, not 61 as is now proposed. 2) LP 27 Flood Risk (Contravened) It then states "The local public sewer does not have capacity to accept any discharge of surface water run off from the proposed site (which is in a level 3 Flood Zone). Surface water run off from communal carparking (greater than 800sqm or 50 car parking spaces) and hard standing must pass through an oil, petrol and grit interceptor of adequate design before any discharge. There appears to have been no such consideration for the increased impact that 75 (which should actually be 78 according to policy) or for Sustainable Drainage System (SuDS). It is my understanding that this should have been a priority consideration given the Flood Zone 3 and Conservation Area status of the site. If extensive re-working of the existing sewers would be required, then a "Breach of Material Planning Considerations" would be made in terms of Noise, Dust, Vibration and Smell disturbance. What consideration has been made as to how the current sewerage system could still be operational while such works were carried out? I note on the application form for the proposal it was asked "Are you planning to connect to the existing drainage system? the developers answered "Unknown" indicating that no consideration as to the extent of the work and disruption has been made. 3) Policy LP 29: "Management of Water Bodies" (Contravened) 12.40: "Where proposals include an existing area of water there needs to be careful consideration of the potential Flood Risk and Biodiversity implications of the development proposals". 12.42: "Every opportunity should be taken to maintain the environmental and biodiversity benefits of mill ponds". I note with concern that the proposed "face lift" to the existing mill pond. I also note the lack of concern for the existing wildlife who live on, in and around it. Firstly, on the proposal plans for the mill pond there is no island. The mill pond currently in existence on the site has an island in the middle on which there is a large, established weeping willow tree. This island is currently home to 2 adult Canada Geese and their 4 goslings.

They have returned year on year to nest there as the island is safe, undisturbed, and secluded for them. We also have ducks (mallards), breeding there every year alongside two Herons who use the Willow Tree, Swifts, Sparrow Hawks, Swallows, Owls, Jays, Jackdaws, Pheasants, Dippers and Kingfisher there too. There is a broad array of other birds who visit the area, but too many to list in this letter. There are fish living in the pond who come to the surface to feed. Frogs and toads also use the pond. Alarmingly, the report submitted by Brindle Green Ecological Consultants (Jan 2021) makes no mention of any of these. I feel very strongly that it should be noted that the Biodiversity Study commissioned was commenced on 6th January 2021. By their own admission this is "outside of their optimal survey period" (i.e. in the middle of winter when wildlife is far more sparse). In addition, we have first-hand sighting of bats in the mill pond area. An earlier ecological study carried out in 2011 states that the survey was taken at the optimal time (August) for bat occupancy. It showed that "there was no bat occupancy in the old mill building, but they were present at dawn and dusk especially over the mill pond" (this is also our experience of sightings). It goes on to say, "The demolition of the old mill will not cause fragmentation of roosts or loss of habitat as long as the Mill Pond is left undisturbed". I have grave doubts as to the validity of the submitted Biodiversity report, given that it is now peak season for wildlife. Brindle and Green do their "On-going assessment" once every few weeks when they wander around for an hour or so with a clip board. Their report seems to assess for species that we know will not be found there such as snakes and lizards (which can be seen high up on the moors, not in a valley bottom). We live here and see the vast array of (not captured in the report) wildlife daily. My husband has compiled an accurate and lengthy biodiversity assessment which actually does reflect the wildlife seen and will submit this with his opposition. On the application form the developers were asked Qu 12: "Is there any reasonable likelihood of the following being adversely affected within the application site?" (B, Designated sites, important habitats, or biodiversity features). They answered "No". This is not true. When asked Qu 10: "are there any trees on or adjacent to the site that could influence the development or may be important as part of the local landscape character?". They answered "No". This is untrue. I refer back to the weeping willow tree on the island the whole of which has been omitted from the plan illustrations. Also, the entire site backs on to a large stretch of old, established woodland which will no longer be visible from Woodhead Rd but forms a large part of the character of the valley bottom and surrounding area. In light of this, no acknowledgement has taken place of the fact that it is a "wildlife corridor" that links all through the valley bottom. This corridor will now become a small area in between two building sites (Perseverance Place and Prickleden). The noise, dust, heavy plant traffic and disruption of two active building sites next to each other would be untenable for the wildlife and for the residents who live around the area. 4) LP 11: "Design" (Contravened) LP 24 "Proposals should promote good design by ensuring a) The form, scale, lay out and details of all developments respect and enhance the character of the townscape, heritage assets and landscape. b) maintaining appropriate distance between buildings d) high levels of sustainability h) enhances the natural environment and biodiversity All of the above points have not been adhered to. The size and scale of the proposed development is not remotely in keeping with the Holmfirth area, which is a conservation area. It will directly and adversely affect at least two listed buildings (23 and 25 Woodhead Rd). The reason for the increased number of proposed apartments is not to enhance the area or indeed to fill a gap in housing of that type. There is already a complex of over 55's apartments less than a 5- minute drive away. It is not to benefit the town of Holmfirth or its residents and businesses. The reason for the increase is purely for financial gain. The previous developers, by their own admission stated that "46 apartments would not be financially viable". This can be read in the previous changes to proposed planning in 2018. No other building in the area is anywhere near as high or overbearing. The original mill would have been dwarfed by the proposed buildings. There are no other 7 storey blocks of flats in Holmfirth. The style of the building would be more in keeping

with a Leeds waterfront development. Not an old historical town such as Holmfirth. It far exceeds the scale and height of the previously agreed proposal and would be an unavoidable eyesore. It would ruin the landscape, not enhance it. The building would not enhance the biodiversity. It would further strip it of its habitat. This has already happened once when the land was "cleared". A digger turned up at 7.30a.m one morning at the end of September 2020 (which was still in nesting season) and ripped up all the plants, trees, saplings, bushes, and shrubs that had been home to a broad array of wildlife for many years (including Roe Deer). It is now a pile of branches on a stripped landscape. The "Biodiversity" assessment was carried out after all the wildlife had been forced to move on. There are no plans for solar panels for sustainability. Just grey slate tiles. Most old buildings in Holmfirth have sandstone slate roofs. No planning for electric car charge points. The buildings would be far too close to existing listed properties and neighbouring properties such as ours and number 29. This would be a huge encroachment on privacy. Had a Residential Visual Amenity Assessment been carried out all of this would have been blatantly apparent. The proposed plans would have certainly been deemed "inescapably dominant, overwhelming in views in all directions and unpleasantly encroaching". There has been no public consultation with the people who live and work here. Previous consultations with other developers about the smaller proposals concluded that the height of the buildings would not exceed the height of the chimney of Hawthorne Cottage. Sadly, this is now mostly derelict, but photographs remain in circulation to give an indication of the height as it once stood. The new proposal far, far exceeds this height. In terms of "Material Planning Considerations" the following applies to numbers 23, 25, (both listed buildings) 29, and 39. (old residential properties which were standing at the time the old mill was). Overshadowing/Loss of light: Loss of light will impact upon numbers 23, 25 and 29 Woodhead Rd owing to the height and proximity of the proposed buildings. Number 39 (our home) would be impacted by the building of the "Resident's Lounge" which would be approx. 9mtrs from our downstairs bedroom windows and would block out the already limited light. Overlooking/Loss of Privacy: This area is one of extremely high concern for all the residents at the above properties mentioned. The windows of the apartments will look straight out on to and into our homes and outside space. The balconies will also look straight out at our homes and outside space resulting in a significant loss of privacy. Visual Amenity: The scale and height of the proposed buildings will completely obscure the view of the opposite valley side from Woodhead Rd. The old, well established woodland strip and field will no longer be visible from further up the valley and from Woodhead Rd. The only trees that would be visible from down here would be the tops of the trees in the cemetery right at the top of the valley (Cemetery Road). Again, this would have clearly been noted to be detrimental to the area and not remotely in keeping with other buildings in the valley bottom had a Visual Amenity Assessment been carried out. The design of the buildings is overbearing with a "tower" reminiscent of the one on Stanley Royd mental hospital in Wakefield! The scale is just too big for an area that size. No views or opinions of the people who will have to live in the shadow of it have been asked by the developers. Noise and Vibration: I have concerns as to what impact pile drivers/drilling would have on walls around the area, some of which are holding up Woodhead Rd, the river, and our homes. Traffic: I know that this is an area of very great concern for those who have submitted objections and for those who have not. The parking space provision should be 78 not the proposed 75 for the amount of housing proposed. There is disparity in the Traffic Assessment recently carried out for 61 apartments and the previous assessment in 2012 for 46 apartments. The earlier assessment indicated a far more significant impact on traffic yet for far less apartments. The assessment produced by Paragon Highways is completely non-factual, based on poorly supported supposition and contradictory. Point 4.5.3 Assumes that infrequent trips will be made owing to an older demographic living in the age restricted apartments. Point 4.5.4 Then states that it is anticipated that the majority of trips to and from the site will be made on foot or by bicycle. The other local age restricted apartments in the area

with the same demographic have NO residents who go out into town on a bicycle. Not least as there are no cycle lanes on Lower Mill Lane or Hollowgate. So, I ask where is the basis for the assumption that the new occupiers will be predominantly out on Bicycles or on foot? I suspect it is more likely that the owners of the apartments will have at least one car per household. An increase of 61 cars (or 224 bicycles apparently) will, without doubt have a negative impact on the narrow streets (Hollowgate and Lower Mill Lane) which are already a cause for concern for local businesses and residents as you will be aware. I note that no consideration has been given to the increased traffic that such a demographic would create. This includes family and friends visiting, delivery drivers, home care (up to x4 visits per day), chemist deliveries of medications, district nurses, emergency services and community nurses (of which I am one. Therefore, I know the needs of this demographic well). The current levels of traffic in and through Holmfirth are already causing grid lock and surface damage. Hollowgate is also a pedestrian school route for the local junior, infants and high school. What safeguards would be put in place to ensure that they are safe to continue to walk this way to and from school when there is an influx of heavy plant traffic and then the subsequent increase in traffic flow along Hollowgate? The pavements are very narrow in places, resulting in the children having to walk in the road. I would also like to point out that Hollowgate and Goose Green are routes used by children of The Nabb (Holmfirth Junior and Infants School) walking to and from school. The construction work and then the subsequent increase in traffic would render this pedestrian route unsafe for younger children who at present can safely use the route. The one positive appears to be the work to The River Walk. However, on closer reading and inspection of the proposal, it transpires that this is to be a "gated community" and therefore the river walk will only be accessible to the residents as it runs through their carpark. Hardly "inclusive of the community". The stretch of land on which this walk is proposed to be built is one of the few areas where wildlife can live undisturbed by pedestrians. I hope the contents of this letter have gone some way to conveying my concerns and that it supports my objection with relevant questions to be answered and factual information to be taken into consideration. Thank you for taking the time to read it. Yours sincerely,

From:
To: [DCAdmin](#)
Subject: Further information re. Objection
Date: 12 July 2023 22:00:56

To Whom it may concern.

Please find additional supporting documentation in regards to my objection to the proposed site at Prickelden Mills Ref: 2023/91491.

Please feel free to attach this to my objection.

Kind Regards,



YorkshireWater

17th January 2008

Dear Sir,

Land at Prickleden Mills, Woodhead Road, Holmfirth, Huddersfield - Pre-Planning Sewerage Enquiry/Flood Risk Assessment - Residential Development

Thank you for your letter of 4th January 2008 and remittance. Our official VAT receipt will follow under separate cover. Please find enclosed a complimentary extract from the Statutory Sewer Map. This indicates the recorded position of the public sewers. The following comments reflect our view, with regard to the public sewer network only, based on a 'desk top' study of the site:

There are 300mm diameter and small diameter public combined sewers recorded crossing/close to the site. No buildings are to be erected within 3 (three) metres, nor trees planted within 5 (five) metres of these public sewers. It may not be acceptable to raise or lower ground levels over the sewers, nor to restrict access to the manholes on the sewers. If you wish to have these sewers diverted under Section 185 of the Water Industry Act 1991 an application should be made in writing. To discuss this matter, please telephone 0845 124 24 24.

The local Waste Water Treatment Works (WWTW) is Neiley. It is understood that this WWTW may only have limited spare capacity, if any, available. We have contacted the Area Asset Manager for more information regarding the impact of proposed development and will contact you when an assessment has been made.

Development of the site should take place with separate systems for foul and surface water drainage. The separate system should extend to the public sewer.

Foul water should discharge to the 300mm diameter public combined sewer recorded in the River Holme, at a point adjacent to the site.

The local public sewer network does not have capacity to accept any discharge of surface water from the proposal site. The developer is advised to contact the Environment Agency/local Land Drainage Authority with a view to establishing a suitable watercourse for discharge. It is noted that a watercourse, River Holme, is located next to the site. This appears to be the obvious place for surface water disposal.

Surface water run-off from communal parking (greater than 800 sq metres or more than 50 car parking spaces) and hardstanding must pass through an oil, petrol and grit interceptor/separator of adequate design before any discharge. Roof water should not pass through the traditional 'stage' or full retention type of interceptor/separator. It is good drainage practice for any interceptor/separator to be



located upstream of any on-site balancing, storage or other means of flow attenuation that may be required.

The public sewer network is for domestic sewage purposes. This generally means foul water for domestic purposes and, where a suitable surface water or combined sewer is available, surface water from the roofs of buildings together with surface water from paved areas of land appurtenant to those buildings. Land and highway drainage have no right of connection to the public sewer network. Land drainage will not be allowed into a public sewer. Highway drainage, however, may be accepted under certain circumstances; for instance, if SUDS are not a viable option and there is no highway drain available and if capacity is available within the public sewer network. In this event, the developer will be required to enter into a formal agreement with Yorkshire Water Services under Section 115 Water Industry Act 1991 to discharge non-domestic flows into the public sewer network.

The site is within an area that may be affected by river flooding. We would advise you to contact the Environment Agency for details.

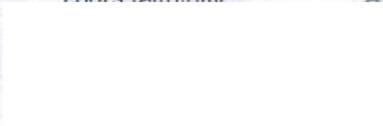
There are no properties in the vicinity of the site on the DG 5 (sewer flooding) Register.

The reported incidents of sewer flooding in the area around the site on the YW operations database are associated with blockages/collapses in small diameter sewers.

Any new connection to an existing public sewer will require the approval of Yorkshire Water. You may obtain an application form by telephoning 0845 124 24 24.

All the above comments are based upon the information and records available at the present time. The information contained in this letter together with that shown on any extract from the Statutory Sewer Map that may be enclosed is believed to be correct and is supplied in good faith. Please note that capacity in the public sewer network is not reserved for specific future development. It is used up on a 'first come, first served' basis. You should visit the site and establish the line and level of any public sewers affecting your proposals before the commencement of any design work.

Yours faithfully,


New Development Team