

Kirklees Planning Department

Kirklees Metropolitan Borough Council

Development Management

PO Box B93

Huddersfield

West Yorkshire HD1 2JR

31a Woodhead Rd

Holmfirth

HD9 2JU

14/07/23

Dear Mr Hirst,

**I object to the proposal 2021/92003 for 61 apartments at Prickleden Mill on the following grounds:**

### **1.The scale, massing and visual impact of the proposed development**

The number of dwellings at 61 x 2 and 3 bed roomed apartments (124 bedrooms) is considerably greater than the 49 x 1 and 2 bed apartments from the 2018 (consented) planning application.

The eaves height of the current proposal is in places 3 storeys higher than the consented scheme revised in 2018 and considerably higher than the 2 storey mill buildings that previously occupied the site.

The building of a large residents' lounge / communal building planned directly in front of no 29 Woodhead Rd seems an unnecessary addition to an already crowded complex when Holmfirth is very well served with community buildings.

In the consented application, there was a comprehensive visual impact assessment – which would be appropriate for this current proposal. Coupled with large scale plans and a public pre – app community consultation, local people were given a fair overview of the plans, able to talk to the developers and a chance to make an informed judgement. Similar opportunities should be made here.

### **2. The threat to landscape character**

**LP32** clearly states 'Proposals should be designed to take into account and seek to enhance the landscape character of the area considering in particular: b." the setting of settlements and buildings within the landscape" and "the appearance of rivers, canals, reservoirs and other water features within the landscape".

The site contains one of only three remaining historic mill ponds in the Upper River Holme. Much of the landscape features would be hidden by the imposing size of this incongruous development.

Prickleden Dam serves as a much – needed wildlife refuge and historic landscape feature within the conservation area. The last time the mill pond was surveyed, according to the KC Lead Planning Authority Report, was over 10 years ago. The Design and Access Statement refers to two alterations to the mill dam which are of concern:

'Around the pond is a raised walkway, which cantilevers over the pond'. This is not illustrated on any artist's impressions but would impact the appearance and biodiversity of the mill pond.

The developer proposes 100% mitigation of loss of flood plain by lowering the level of the mill pond. This suggests a major alteration, again, no detail is given.

The residents' lounge and apartment blocks A, B and E are built directly on the water's edge, removing any 'buffer zone' for aquatic or terrestrial wildlife and obscuring the river and dam features in the landscape.

### **3. Biodiversity**

**LP34** states in **1c.** that there should be 'no deterioration of water courses or water bodies...and where practicable enhancing ...the ecological value of the water environment, including the functionality of habitat networks.'

The River Holme is an essential wildlife corridor and there are 13 bird species on the amber list, 7 birds on the red data list present or migratory users of Prickleden. Four species (including Eurasian hedgehog, common toad, bullfinch and song thrush) that inhabit the site are on the Kirklees BAP Species of Concern list. The installation of bird nesting boxes and low-level lighting to protect bat feeding areas.

I hope that Kirklees Planning Authority will ensure **LP30.ii** which states "**Development proposals will be required to:**

(ii) minimise impact on biodiversity and provide net biodiversity gains through good design by incorporating biodiversity enhancements and habitat creation where opportunities exist

The EA's comments have not been published on the planning portal for this application which would make it easier for the public to make judgements/pass comment. The riverbank directly upstream from the proposed site is already being greatly affected by the building of houses at Perseverance Place and a major development of Mill Buildings in Hinchliffe Mill ( 2021/62/90800/W) is a possibility, so there is a real risk to biodiversity on the River Holme ecosystem from overdevelopment.

### **4. Impact from increased motor vehicles using Lower Mill Lane and Hollowgate**

The current proposal should contain provisions to discourage private car ownership recommended in **LDP 10.80** where

If Kirklees Council grant permission for the building of 61 homes and 78 parking spaces, the resulting increase in traffic will be at loggerheads with their own Improving Holmfirth Town Centre Access Plan, a £3.9 million scheme to ease traffic congestion. Reducing the number of dwellings would be a prudent solution to this strategy.

There is a national increase in home deliveries by commercial vehicles and this trend is set to continue. HGVs regularly damage the historic bridge linking Hollowgate with Woodhead Rd. There is a real risk of short-term damage and disruption to both Hollowgate and Lower Mill Lane from HGVs during any site works and a long term threat of increased traffic generated by residents' cars,

deliveries and services (such as waste vehicles and medical assistance) if the proposal is accepted at the current scale.

I share one resident's comment that Lower Mill Lane will cease to be a safe area for children to play as a result of increased traffic.

## **5. Housing Need**

The 2021 application was refused on the grounds that it did not satisfy local housing need. The current plans do not include affordable homes. In order to meet the (SHMA) sub area context the development should consist of affordable 1- and- 2 bedroom homes specifically for older people. 12 affordable units would be sought from a development of the proposed size, in accordance with **LP11**. The site seems even less 'permeable' than the last proposal, with the much-needed riverside walkway being fenced off from the development and the retention of security gates.

While there is undoubtedly a local need for housing provision for the elderly, the scale and nature of these apartment blocks would not meet a local need for affordable, accessible homes where residents would be integrated into the Holmfirth community. Gated access, basement bin stores and a lack of fundamental day-to-day facilities such as a place to hang washing or do gardening are missing from the Prickleden proposal. The cost of 2-3 bed apartments of this size (average size is 90m<sup>2</sup>) and the inevitable service charges imposed on apartment complexes of this kind would preclude the majority of local people from Kirklees Rural West from being able to afford to live there and consequently only serve to meet the housing need of others outside of Kirklees. Attracting new residents from outlying areas will increase pressure on local services.

## **6. Wastewater and Sewerage**

The plans do not account for the existing public sewerage infrastructure, a concern shared by Yorkshire Water.

## **7. Flood Risk**

It is alarming that the applicant has chosen to re-submit the 2021 flood report and that the design shows no adjustment to avoid and mitigate against flood risk, despite comments from KC Lead Local Flood Authority that flooding of the undercrofts poses a risk to life.

## **8. Building Character**

The design of the scheme is in breach of policy **LP24 Design** and **Policy 2** of the **Holme Valley NDP**. Historic England consultation response states that the "scale and massing of the buildings could appear over-dominant in the landscape".

(a) It does not enhance the character of the townscape, heritage assets or landscape.

(b) It does not demonstrate enhancement of the natural environment, support biodiversity, and connect to and enhance local ecological networks and green infrastructure.

(c) The glazed cantilevered balconies are not in keeping with the vernacular