

**From:**  
**To:** [Planning Portal](#)  
**Cc:**  
**Subject:** Comments on Planning Application 2023/62/91491/W Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU  
- 61 apartments, age restricted (>55yrs) in 5 blocks  
**Date:** 21 July 2023 17:01:05

Mr N Hirst  
Kirklees Council  
PO Box 1720  
Huddersfield  
HD1 9EL

I am writing to make comments on behalf of River Holme Connections regarding the Planning Application:

**Application number**  
**2023/62/91491/W**  
**Last updated**  
**17 July 2023**  
**Applicant**  
**Eliston Homes**  
**Location**  
**Prickleden Mills, Woodhead Road, Holmfirth, HD9 2JU**

Dear Mr N Hirst

Overall we welcome the developers enhanced proposals concerning the river environment and access.

Nevertheless, **River Holme Connections** do have some comments and suggestions which reflect our own consultations and the recent Kirklees Place based Standard Holmfirth consultations:

- In the detailed design and access statement, surprisingly the site is quoted as “located between the villages of Flockton and Grange Moor” We wonder how much more of the document is ‘cut and paste’ and therefore not relevant to this site? Reassuringly to note, however, that the 12 digit OS Grid Reference is correct, and I find that it is located in the town of Holmfirth.
- It was noted with interest the mention in the section, Connectivity, page 6, a Public Right of Way, “to improve public access to the river.”

River Holme Connections would be delighted if their newly revamped and signed Riverside

Way, linking the entire River Holme watercourse, was allowed access into the West end of the site and exit at the East, via the proposed two new bridges to Hollowgate. However, it is stated that there are “no public rights of way through the application site”, which is accurate. However, the next but one sentence states “It should be noted that as part of the application the applicant seeks to enhance the riverside for public access.” This is entirely misleading. Should this mean residents and NOT general public, as there do not seem to be any mention of arrangements to negotiate access through adjacent property land to make a contiguous riverside way route.

It would seem logical to connect the potential new riverside path on site into the preexisting **Riverside Way** in order to allow for Active Travel along the valley floor, both up and downstream to allow for leisure, commuting and commerce. We strongly recommend that this application is conditioned with public access and that the proposed route is registered and recognised as a formal right of way (bridleway). This is vital to open up the possibility of future Park & Ride opportunities into Holmfirth town centre. River Holme Connections would be able to assist in the design and signage to merge the bridleway.

- The proposed pedestrian bridges are too narrow at 1.8 metres. This does not allow adequate space for people passing both ways, wheelchairs, pushchairs or wheeling bicycles. Public access should be recognised as a bridleway to allow cycles. The Riverside Way is a safe route for active travel and the width of the route and bridges should be designed accordingly.

The Kirklees member-led organisation, **Outlookers**, ([www.outlookers.org.uk](http://www.outlookers.org.uk)) provide support for people with visual impairments and they stipulate that pathways need to have sufficient width for two persons travelling abreast.

- Again in Connectivity, page 6, there is a comment that Holmfirth centre is “some 300 metres walk from the entrance to the site” and that occupancy will be expected to be from people from the local area. If this is the case, then it is not sustainable to provide 78 car parking spaces. This could be halved, and thereby increase green community space, and prevent “dirty run off” from parking bays right on the edge of the river. Surely many people wanting to purchase will be looking to dispose of their cars and make alternative arrangements, such as car hire?

The car parking spaces released on the South bank could be used to build more affordable homes.

- There is no mention of surface water flooding and run off. Flow rates could be lowered, increased capacity of water storage, and water quality could be improved, and the amenity and biodiversity value of the site’s environment, if a SuDS (Sustainable Drainage System) alternative draining solution was factored in. ie use pebbles / limestone chippings rather than tarmac.
- Lowering the mill dam will mean a loss in biodiversity, which hopefully will return but the ecology will change.
- From the Supporting Document Ref: [Ecological/Biodiversity Statement \[id 994455\]](#) 16/06/2023 - Net Gain Assessment

The loss of biodiversity of -6.30% habitat units within the site (DEFRA 4.0 Metric) is something that we at River Holme Connections would be able to assist the developers in mitigation.

Working together, we have technical expertise, and local landowners connections which would mean provision of successful BNG, with the future continuity agreements of 30 years (LEMP Landscape Ecological Management Scheme) for continuous control. In addition we can assist with management of the river banks and greenfield, INNS management, site signage and path improvements around the site; plus a River Stewardship model scheme.

We recommend if the scheme is approved the developer works with **River Holme Connections** to manage its BNG liabilities.

Should you wish to discuss any of the above please do get in touch.

Yours sincerely

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