

**Consultation Response from Calderdale MBC****2023/92448 Former Cooper Bridge Water Treatment Works, Leeds Road, Mirfield, WF14 0BT****Outline application for erection of B8 industrial unit****Date Responded: 5<sup>th</sup> July 2024****Responding Officer: Kate Peach, Principal Conservation Officer****Responding Ref:**

The site is located close to the boundary with Calderdale and is an area of considerable heritage significance, albeit now somewhat dominated by roads, sewage treatment plants and other large scale modern interventions.

The site is relatively close to a number of Calderdale's important designated heritage assets. Kirklees Park is located to the north-west of the site and is a Grade II Registered Park & Garden, of considerable significance in its own right but also the location of a number of listed buildings sited in and around the historic farmstead of Home Farm and including:

Kirklees Priory Gatehouse (Grade II\*), Walls of the former orchard to Kirklees Priory (Grade II), The Nun's Grave (Grade II), The Malthouse (Grade I), L-shaped aisled barn (Grade II\*), Home Farm Building No 6 (Grade II\*), Double aisled barn (Grade I). The Grade I listed Kirklees Hall is located within the same designated parkland but further to the west.

Given the number and gradings of these designated heritage assets, including some of Calderdale's most significant listed buildings, clearly any impact the proposal may have on the significance of this parkland site needs to be given careful consideration.

In addition, relatively close to the site are further designated heritage assets within the Calderdale boundary and associated with the waterways and in particular the Calder and Hebble Navigation, itself an important non-designated heritage asset. These listed assets include Cooper Bridge Lock 1 and Cooper Bridge Lock Keeper's House, located to the south of the site and the adjacent sewage works, both listed at Grade II; and Lilac Cottage and Wharf Works located close to Cooper Bridge Road, both Grade II. Despite the built-up nature of the area, the river and canal provide a highly characterful setting for these assets.

It is noted that no heritage statement has been submitted as part of the application, which is of concern given the above. The submitted Design & Access Statement refers very briefly to Heritage / Archaeology stating - "The application site is not in a Conservation Area, and there are no listed buildings within the vicinity of the site." Thus the heritage in the wider vicinity is not recognised.

It is noted also that the Site Plan and the Parameters Plan includes reference to a building height or ridge height of 24 metres. Other documents refer to a warehouse, and indicative plans suggest the site would be developed for one large building of this potential height rather than broken up into smaller blocks. Whilst it is appreciated that the site was previously occupied by a water treatment works, it is understood that the built form at that time was generally low rise with 2m high tanks and walls. Clearly a development of the indicative height now proposed would represent a substantial increase in the height of the built form on the site, with large bulk and massing. Thus it is considered that there is potential for there to be harm to the significances of the heritage assets referenced above by virtue of development within their settings particularly in terms of longer distance views.

Such harm would need to be considered in terms of the relevant paragraphs of the NPPF, including paragraph 206 which requires clear and convincing justification for any harm. Paragraph 208 is specific to instances where there is considered to be less than substantial harm to the significance of a designated heritage asset, and requires any such harm to be weighed against the public benefits of the proposal.