

Consultation Response from KC Public Health**2023/93539 Land adj, Ledgard Bridge Mill, Back Station Road, Mirfield, WF14 8NZ****Outline application, including the considerations of access appearance, layout, and scale, for the erection of a six-storey building to host 76 residential apartments (C3 use) and ancillary works comprising demolition of vacant building, formation of new access, parking areas, open space and landscaping; erection of cycle and bin refuse storage structures****Date Responded:** 4th January 2024**Responding Officer:** Louise Muhammad**Responding Ref:** 2023/93539**This response is from the Public Health Improvement Team.**

In Kirklees, the Public Health Improvement Team has developed a rapid health impact assessment (HIA) framework and guidance tool for planning applications. The purpose of this is to assess the broad health impacts of proposed developments. The rapid HIA is a material consideration in the Kirklees Local Plan and is listed in the Kirklees Validation List.

The Public Health Improvement Team will carry out its responsibilities, as a consultee for the Kirklees Planning Authority to:

- Apply an agreed rapid HIA screening [methodology](#) at the pre-application / application stage, to identify if a rapid HIA is required for a proposed development.
- Review and respond to a submitted HIA, focusing on the health improvement themes relevant to local and national planning policy and the public health priorities which impact on the immediate and surrounding areas of the proposed development.

The Public Health Improvement Team do not provide specialist technical advice or feedback on development proposals, such as around waste, noise or air quality. This responsibility lies with other council teams and their responses will be provided separately.

Local intelligence shows that the following health indicators for adults within Mirfield Ward, where the proposed development is taking place, are higher than the Kirklees average.

- Physical Activity Levels (lower than average)

The submitted rapid health impact assessment has been reviewed. The Public Health Improvement Team have identified further measures and considerations surrounding the development issues, as outlined in the table below, which look to enhance the proposed development and further improve health and wellbeing outcomes for people and place. We kindly request that the measures set out in the table for each development issue are

incorporated into the submitted Rapid Health Impact Assessment and implemented should the application progress.

Development Issue	Further Measures and Considerations-The applicant has not comprehensively cross-referenced between the submitted HIA and other submitted documents, i.e., by giving specific page numbers for relevant content. This makes it difficult for us to assess whether particular areas of focus have been adequately addressed and this should be taken into account when reading this response.
Construction Phase	<p>Details on the construction phase in the application are currently sparse as it is stated a CEMP has not yet been developed (but will be along with a Construction Method Plan). Public Health would expect a full CEMP to be submitted in due course, outlining plans for the construction phase, highlighting any potential impacts to the local population and identifying mitigations to help manage these impacts against the listed areas (noise, odour, air quality etc). It should also reference personal safety measures and the provision of security on site outside of operating hours, as a mitigation measure to prevent anti-social behaviour and crime.'</p> <p>We note the inclusion of a comprehensive Noise Impact Assessment, as the development will be in close proximity to the railway station. Therefore, could acoustic glass be a consideration as opposed to standard double glazing units to offer better sound insulation when windows are closed (especially for those properties who have windows facing the railway line) Especially, as it appears there is some rail traffic during the hours 11pm-7am (including freight etc). Noise pollution has the potential to really impact on population health (and on mental health in particular).</p> <p>We welcome the commitment to sustainable construction methods made by the developer.</p> <p>Although the proposed development is on a site next to an existing residential block/building (and is a 'phase 2') we would still encourage some form of resident and/or community engagement be put in place (especially as it includes some demolition elements). This will ensure that there are opportunities for ongoing communication, to</p>

	<p>keep residents informed, for them to raise any issues or concerns, and for these to be picked up and addressed by the developer.</p> <p>We recommend that the developer makes provisions to support the health and wellbeing of staff employed as part of the construction phase, including: -</p> <ul style="list-style-type: none"> - Provision for safe and secure cycle parking on site for staff wishing to travel actively during the construction phase. - Some consideration regarding facilities that help construction workers to be able to store/eat/heat their meals during the working day - Linkage into local health and wellbeing programmes / support services where appropriate and display of information for staff working on site, e.g., Kirklees Wellness Service (https://kirkleeswellnessservice.co.uk/) can provide support around smoking cessation, healthy weight, mental health, etc.
Housing	<p>Reference is made to this development being a 100% 'Build to Rent' scheme that will contribute directly to the Kirklees Council strategy/targets around new homes provision. However, there is no mention of 'affordable' rents even though the development is being designed for a range of people (who have smaller property requirements) not just necessarily 'professional' couples with small families. Public Health would ask that some consideration is given to affordability for those who maybe are in need of housing but are in a lower socio-economic situation etc if this is feasible.</p> <p>With regards to access and the proposed 6 storey building (containing duplex apartments) is the provision of 'a' lift to service those above ground level adequate (in the event it was out of action/in need of repair or maintenance etc). What mitigations are in place in such instances for those who may have mobility issues and/or children's buggies etc.</p> <p>Really encouraging to note that all apartments have some private outdoor space c/o a small</p>

	<p>balcony.- which will afford tenants the option for sitting out, some plants/growing box and drying clothes in amenable weather. Has any consideration been given to any indoor drying area/space as part of the design process-in view of inappropriate drying being the cause of much household condensation, damp and mould issues? It is probably already stated somewhere but we would also encourage good ventilation especially in bathrooms and kitchen areas.</p> <p>The above feedback from PH is in line with the developers statement that the development aspires to provide current and future generations. The more we can consider futureproofing from the outset in the design features the more likely the development can become 'homes for life' (for those that choose)</p> <p>Also, good to see that some dedicated storage space is part of each apartment design.</p>
<p>Active Travel and Sustainable Transport</p>	<p>The location of the proposed development would appear to present really positive opportunities for residents to engage with active travel as it relates to walking or cycling (to nearest commercial centre), bus route and the close proximity to the train station-especially for those commuting to work in the surrounding towns/cities etc. In addition, cycle spaces and storage are incorporated into the development.</p> <p>The travel pack contents that each resident will receive appears to be very comprehensive. Good to see some targets to reduce single journey car usage by 10% on the site over a certain period have also been identified-Public Health really encourage this approach. as it has positive impacts on health including environment and air quality.</p> <p>The application could be strengthened even further in this area by inclusion of accessible walking and cycling maps/signage. These should detail any key destinations (e.g., local services and amenities), with distance and time to these destinations via walking, cycling and public transport. The designated travel plan coordinator should support and coordinate this activity.</p>

	<p>With regards to those residents who want to or have to use cars there seems to be adequate parking provision-however it was unclear from what has been submitted whether or not any consideration has been given to visitor parking (apologies if it is stated and been overlooked). However, good to see the provision of 18 visitor cycle spaces.</p>
<p>Access to Open and Green Spaces</p>	<p>It is noted that there will be no 'play space' contained within the development even though its stated the apartments are appropriate for one child/small families as part of the tenancy mix. If it is at all possible to include some provision it would really improve quality of life for those with small children and give added capacity to just a small balcony. We appreciate due to being located near to a river/water way there may be other factors to consider with regards to safety-but we encourage further exploration.</p> <p>However public health welcome the inclusion of a 'pocket-park' and the indicative landscaped areas that have been earmarked across the development. We would also strongly suggest these areas are made smoke-free.</p> <p>It is anticipated there will be very little impact on biodiversity and wildlife-but where some risk has been identified, appropriate mitigations have been considered.</p>
<p>Access to Healthy and Affordable Food</p>	<p>The site location we agree gives residents access to a choice and variety of retail outlets where fresh, healthy and affordable food can be purchased/accessed plus in walkable distance in most instances.</p> <p>The interior design of apartments also compliments being able to eat in a designated space together which is welcomed.</p> <p>It is stated that specific growing spaces are not intended on site, however, could some consideration be given to a few fruit trees or shrubs dotted throughout.</p>

<p>Community and Personal Safety</p>	<p>Consideration has been given to lighting both for pedestrians and vehicle users. Also designated parking areas have CCTV surveillance. Cycle storage is of a secure design and windows/doors have locks/security features.</p> <p>Consideration also needs to be given to the outdoor communal spaces including the pocket park/central hub area.</p> <p>There should be good line of sight across the development, directions and signage where feasible.</p> <p>Roof areas (access) and open spaces should also consider appropriate suicide prevention measures. Please refer to this information and guidance https://www.gov.uk/government/publications/suicide-prevention-suicides-in-public-places.</p>
<p>Employment and Economic Vibrancy</p>	<p>Developer is quite vague in this regard although it is stated as an area for consideration should the application be successful. PH would recommend that there is some local benefit with regards to jobs/employment and/or training opportunities as well as procurement of local goods and services.</p> <p>To support this commitment further, we would recommend the following: -</p> <ul style="list-style-type: none"> - Consider local labour and supply chain opportunities (e.g., through Meet the Buyer events) from the construction phase onwards. - Liaise with local skills, training and employment programmes led / commissioned by Kirklees Council, as well as local apprenticeship schemes. - Request all (sub) contractors to support positive employment opportunities and support health and wellbeing in the workplace. <p>However, PH acknowledge that the natural location of the site enables residents to easily access the commercial centre and contribute to that economy. Consider the welcome pack having content about the current retail offer locally (not just confined to supermarkets and food access)</p>

<p>Community Cohesion and Social Support</p>	<p>It is noted that the currently vacant martial arts building on site is scheduled to be demolished to provide overspill carparking that serves both the existing and proposed residential development. PH would recommend revisiting this decision and exploring whether or not this building could be designed as a more communal space/facility with some renovation.</p> <p>The inclusion of a seating area, pocket park, communal gym, etc are all welcomed and will facilitate social cohesion and connection for residents.</p> <p>The intention to explore the setting up of a car club on site in future years will also support cohesion and sharing as well as support greener more sustainable travel.</p>
<p>Climate Change</p>	<p>The plans to incorporate energy saving lights on timers and water saving devices within sanitary ware etc.</p> <p>We encourage the exploration with renewable energy providers as stated with regards to solar panels on the roof (subject to funding) as well as any other feasible measures (e.g heat pumps etc)</p>