Consultation Response from KC Conservation and Design
Application Number: 2024/93494 - Victoria Tower, Castle Hill, Lumb Lane, Almondbury, Huddersfield, HD4 6TA
Erection of restaurant/café/bar, six guest rooms, exhibition/interpretation room, WCs, terrace, car parking and ancillary accommodation
Date: 21/11/2025

Comments:
The application is for a new building to accommodate a restaurant/café/bar, six guest rooms, exhibition/interpretation room, WCs, car park and ancillary accommodation next to a scheduled monument and the grade II listed Victoria Tower.

Significance
Castle Hill is a landmark of exceptional heritage value within Kirklees and the wider region. It is a scheduled monument and also has the grade II listed Victoria Tower on the site. Its striking topography and geological prominence have shaped its role as a focal point for human activity for over 4,000 years, making it one of the most significant and continuous sites of settlement and recreation in northern England. The hill's commanding position provides panoramic views across Huddersfield and surrounding valleys, reinforcing its historic function as a place of power, community, and identity.

The setting of Castle Hill contributes fundamentally to its significance. The undeveloped summit and surrounding open landscape preserve the historic integrity of the site, allowing appreciation of its archaeological features and earthworks that span multiple periods of occupation. Its dual character—as a dramatic feature viewed from afar and as an elevated vantage point—enhances its cultural and visual importance. The openness of the hilltop, combined with its isolation within the landscape, creates an experience that is both historically resonant and valued for recreation today.

Castle Hill's prominence, visibility, and enduring role in the lives of local communities make it a regionally significant heritage asset. Its topographic form, historic associations, and unspoiled setting collectively underpin its status as an iconic symbol of Almondbury, Huddersfield, and Kirklees.

Impact
The proposed development introduces a new building within the immediate setting of the monument and listed tower, which will inevitably alter key views to and from the hilltop and compete visually with Victoria Tower, albeit to a lesser degree. In accordance with paragraph 212 of the National Planning Policy Framework (NPPF), great weight must be given to the conservation of heritage assets, irrespective of whether the harm is substantial or less than substantial. While the proposal does not result in total loss or prevent understanding of the monument's historic form and its two baileys, it does erode the sense of isolation and dominance that defines Castle Hill's setting. This constitutes harm to the significance and falls within the category of "less than substantial harm" and must be afforded considerable weight in the planning balance. Furthermore, paragraph 213 of the NPPF requires that any harm to a designated heritage asset be clearly and convincingly justified, and for assets of the highest significance, such as scheduled monuments,

substantial harm should be wholly exceptional. On this basis, the proposal needs to demonstrate that the public benefits outweigh the identified harm. The applicant had stated they believe the public benefit will be broadly divided into sections:

- Access to better information about Castle Hill
- Greater promotion of the heritage asset
- Benefits to the local economy
- Shelter, catering and WC provision
- Improved access and security

Design
The proposed development has been carefully planned to ensure that its location and design respect the historic and landscape setting of Castle Hill. The chosen site—the former Castle Hill Hotel—was selected for the following reasons:

- it was the area least likely to affect archaeological remains
- it enabled the building to be set into the landscape to achieve minimal impact when viewed from outside the site
- it enabled a beneficial relationship with the entrance road, the car park and the Victoria Tower
- it provided the best opportunity to connect service supplies (from the old hotel) without the need for extensive new trenching

West Yorkshire Archaeological Services (WYAS) undertook a site investigation of the proposed construction area. Their findings confirmed that the siting would have no adverse effect on the site's archaeology, which is considered a benefit to the scheme.

Positioning and Views
The building is designed to sit within the natural topography, allowing outward views while minimizing visual intrusion. By positioning the scheme toward the far side of the site:

- The building is not visible from the access road until visitors reach the car park.
- Views from Ashes Lane, at the base of the hillside, are screened by the hill itself.
- At the top of the hillside, the building permits expansive views over the wider landscape, enhancing visitor experience.

Architectural Approach
The design adopts a traditional aesthetic using natural stone and ashlar, complemented by a zinc roof. Key features include the roof overhang which reduces glare from the extensive ground-level glazing. The glazing at ground level allows views through the building to the listed Victoria Tower, reinforcing its prominence. As most of the structure is below ground, it reduces its impact on the tower's setting. The building has been designed with clean Lines which creates a simple form that complements the tower without competing visually. Access to the building and site is encouraged via a tunnel beneath the building, further minimizing visual impact. The tunnels incorporate stone retaining walls, providing a clear and well-defined route for visitors.

Overall, the design ensures that the Victoria Tower remains the dominant feature on the site, while the new building integrates sensitively with its historic and landscape context.

Policy
The proposal has been assessed against the National Planning Policy Framework (NPPF), particularly paragraphs 212 and 213, which require that:

- Great weight is given to the conservation of heritage assets.
- Any harm to such assets must be clearly and convincingly justified.

While the introduction of a new building in this location does create harm, the application provides some justification based on its design ethos and the claimed public benefits (such as toilets, refreshments and interpretation areas). However, from a heritage perspective, this does not amount to clear and convincing justification. There is no supporting evidence that these facilities are required or demanded by site users.

Local Plan Policy LP35 point 1 states that any development affecting a designated heritage asset (or an archaeological site of national importance) should preserve or enhance the significance of the asset. Point 3(f) is more specific in terms of Castle Hill where the Local Plan requires development to preserve its setting and any proposals which detrimentally impacts on the setting of Castle Hill will not be permitted. It is considered that the introduction of a building within this location would result in harm to the setting of the monument. The proposal cannot be regarded as preserving or enhancing the significance of the heritage asset, as the development would introduce built form into an otherwise open and undeveloped landscape, which contributes to its historic character and setting. While the scheme includes some measures that may offer limited public benefit, such as highway improvements and the provision of facilities, these enhancements are minimal and do not outweigh the identified heritage harm when assessed in accordance with relevant planning policy.

Conclusion
The principal heritage issue relates to the degree of harm to the setting of the Scheduled Monument and the Grade II listed Victoria Tower, and whether the identified public benefits sufficiently outweigh that harm in accordance with the National Planning Policy Framework (NPPF) paragraphs 212 to 221. The proposal does introduce harm to the significance of these designated heritage assets through the introduction of a new building within their setting. However, this harm is assessed to be less than substantial. The scheme provides some public benefits, including an interpretation room to enhance understanding of the historic environment and improved facilities that encourage visitors to stay and appreciate the monument and tower, which is currently limited due to the exposed nature of the site. The design incorporates mitigation through careful siting and scale, and it is essential that the building is not extended in the future; the applicant must confirm that the proposed size meets operational requirements. On balance, the proposals do create harm but less than substantial harm and some of the public benefits could be considered to outweigh the harm identified.

Summary of Recommended Conditions

1. Details and samples of the proposed roofing material to be submitted and agreed in writing with the LPA
2. Samples of the proposed stone walling to be submitted and agreed in writing with the LPA
3. Details of the proposed glazing to be submitted and agreed in writing with the LPA
4. Submission of a Conservation Management Plan shall be agreed in writing with the LPA. Such a management plan should include as a minimum: -
    a) Hours of operation
    b) Management of waste facilities
    c) Operation of the restaurant and associated open eating area
    d) Operation of the interpretative centre
    e) Operation of the toilet facilities in terms of availability and maintenance.
    f) Interpretation
5. Landscaping plan indicating soft and hard landscaping treatments shall be submitted and agreed in writing with the LPA