

Kirklees Planning Department

Re Planning Application Number 202562/91435/W

FAO Jennifer Booth, Case Officer

Dear Ms Booth,

Re Planning application for change of use at 9 Park Drive, Huddersfield, HD1 4EG

1. We refer to the above planning application, and write to register our concerns about the proposal, by the owner of 9 Park Drive, for consent to change the use of the building from an HMO (use class C4) to a residential care home (use class C2), specifically a residential children's home for semi-independent living to support four children, aged 16-18.

We would draw your attention to the objections we raised, on 31st March 2025, to the application for a lawful development certificate to effect this proposed change of use, and to our subsequent correspondence with the responsible case officer, Charlotte Hancock, which referred to many of the serious concerns we raise below.

2. In the application, at 'Diversity and Geological Conservation', negative answers are given to the question about whether or not protected and priority species, and important habitats, on the development site, will be adversely affected by the proposed development.

In fact, 9 Park Drive is a well-established roost and resting-place for bats, which have been in occupation there for many years. As you will be aware, all bat species and their roosts/resting-places in Britain are protected by the *Wildlife and Countryside Act, 1981* and *The Conservation of Habitats and Species Regulations, 2017*.

There is no reference whatsoever, in the application, to the fact that 9 Park Drive is a bats' roost/resting-place, or to what steps are going to be taken to prevent any disturbance to the bats or their roost/resting-place, if consent is given for a change of use to the property.

However, it is vitally important that this serious issue is given full and appropriate consideration by both the owner and the planning authority.

As part of the correspondence with Ms Hancock, **we submitted videos of the bats (common or soprano pipistrelles) coming in and out of their roost at the property, during the evenings**, in order to feed.

Ms Hancock informed us (email of 4th April 2025) that these videos would be saved on file, so we trust that they will be examined as part of the consideration of this application. We have further copies of them, should they be required.

3. Further, we cannot find any indication that a bat mitigation licence was sought or obtained in relation to the extensive building-work that was carried out at 9 Park Drive, in the autumn of 2024, in preparation for the proposed change of use;

and there is no evidence that such a licence has, or will be obtained in relation to the proposed development.

As far as we are aware, **no approach has been made to the Bat Conservation Trust**, to obtain advice and guidance about carrying out a bat survey at the property by a qualified specialist, or about how to ensure the welfare of the bats, and to avoid disturbance to their roost, both now and in the future.

We would repeat our point, made to Ms Hancock, that, under current legislation, **Kirklees Local Planning Authority has responsibilities towards protected and priority species**, and we would like to know what the LPA is going to do to protect the bats at (Park Drive and their roost/resting-place.

As well as being protected species, bats are fascinating creatures, and their presence and activity in an urban environment should be especially valued and cherished.

4. In the planning application, **it is claimed that no work has been carried out at 9 Park Drive** in relation to the proposed change of use.

However, as we have pointed out previously, **extensive alteration and refurbishment work was carried out during the autumn of 2024**, months before this application, or the previous application for a lawful development certificate, were submitted to the authority. This work included the conversion of the double-garage into office-type premises, with a glass frontage, which completely changes its appearance. We can find no evidence that permission was sought or obtained for these developments.

We understand that staff have already been employed to work at the residential home, when it opens, and that the former garage is going to be used as a staff training and development facility.

5. It is admitted in the application ('Vehicle Parking') that the site does not have any existing vehicle/cycle parking spaces.

This is a major concern. The description of the staffing arrangements ('Staffing and Operations Plan) at the proposed residential home, which include four full-time staff, part-time staff, on-call staff, day and night and at weekends, indicates that there would be a very substantial addition to traffic movement at the property and therefore increased demands for parking on the 'reserved for residents' parking areas on Park Drive, with a potentially adverse effect on other residents of the street.

Indeed, we had experience of this potential problem on Wednesday, 18th June 2025, when we returned from a hospital visit to find our driveway blocked by vehicles associated with 9 Park Drive, which also made it impossible to park in the residents' parking area near our house.

This will be a major issue for us, as our elder son has enhanced mobility needs, for which he has a blue badge and a Motability vehicle.

It is crucially important that we should be able to park his Motability car near our house, and, if this application is granted, we want to know what the authority will do to ensure that we do not have to endure this serious nuisance in future.

6. We have lived at 8 Park Drive since the late 1980s. **For over 10 years, until the summer of 2024, 9 Park Drive was run as HMO for student accommodation. During that time, we had reason to complain to Kirklees Environmental Health about noise and disturbance from the property, on a number of occasions.** This noise and disturbance, which occurred during night and day, had a particularly adverse effect on our elder son, who is especially sensitive to excessive noise. We have also been aware of litter and cleanliness issues at No. 9.

As we know from our own experience, 9 Park Drive was not well-run as an HMO. **We can find no information in the application as to who is going to manage the residential children's home, if the application is approved.** Obviously, we would hope that it would be run by an organization with expertise in the field of providing accommodation/caring for young people, with staff who have the qualifications and experience necessary for carrying out this role effectively and successfully, and in a way that takes full account of the needs and well-being of the occupants of neighbouring properties

We note with grave concern the fact that no assistance or prior advice has been sought from the local authority about this development.

While we do not object in principle to the property becoming a small, residential facility, we are extremely concerned about how well it will be managed, if planning consent is given, and the adverse impact such a development may have upon both neighbours and bats who use it as a roost, if it does not operate to the very highest standards.

Yours sincerely,