Application: 2025/62/93543/W

I write to OBJECT to the application proposals.

Objection Contents:

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Summary of Reasons to Refuse:

Application Materials :
- Missing information
- Incorrect/ Uncoordinated/ Misleading information- as submitted

Planning Policy :
- Conflicts with Local Plan and/ or Development Plan policies
- Contrary to government planning policy guidance
- Affordable housing submitted contrary to guidance
- No prior consultation [Pre App] with key parties [LPA, Env Health, Tree Officers, Highways Dept]

Special Designation :
- Loss of important (TPO _ Tree Preservation Order) protected trees
- 'Inappropriate development' in / adjacent to the Green Belt
- Threat to Wildlife

Planning History :
- Other applications refused/ withdrawn and no change in circumstances

Site Considerations :
- Over development
- Excessive bulk and scale
- Excessive retaining/ boundary walls
- Incompatible with the design of existing buildings
- Loss of important trees, hedges and other vegetation
- Threatening a public right of way
- Loss of important wildlife habitats
- Public sewers inadequate
- Insufficient garden or amenity land
- Risk of flooding/ Creation of flood risk
- Threat to health of occupants through contamination

Neighbours :
- Number of Objections
- Overlooking of adjoining properties
- Flooding Impact to Neighbours
- Contamination issues
  On site and to surrounding area
- Generation of noise, disturbance, pollution
- Site clearance issues (year 2025)
- Zero consultation with community

Surrounding Area :
- Poor design
- Conflicts with architectural vernacular of the area
- Poor relationship with adjoining buildings
- Visually damaging in the landscape or in the setting
- Environmental damage
- Road system is inadequate
- Highway safety

The above list should be ample to refuse this application.
Note: This objection is submitted without sight of key consultee responses - from Highways, Environmental Health, Tree Officer etc.

1.1 Foreword:

I own a property on Clough Road, Slaithwaite and have been keeping an eye out for the new proposals for this application site.

I have been genuinely excited to see what plans were being formulated for the land.

I had hoped the new developer would learn from the issues of previous (recently) withdrawn application- and propose a site sensitive intervention befitting of location.

I wish to stress I believe this site is worthy of development – including for residential homes.

However, the proposals as submitted are sadly – **hugely disappointing**.

The proposal is poorly designed, hugely impactful and maximised for returns (amounting to huge overdevelopment of the application site).

I personally believe the site should accommodate circa. between 12 and 15 homes – with homes located and orientated to minimise impacts to neighbours and most importantly; eliminate any/ all ecological damage.

I fully anticipate the proposals will be **REFUSED** by LPA officers on multiple grounds.

I anticipate wider consultee parties including Highways, Tree Officers, Env Health etc (will all) oppose the application- on many grounds.

I wish for LPA officers to keep residents updated of the application appraisal and projected determination dates.

*Although I feel this will be **highly unlikely**, - "if" officers were minded supporting this application -*
I would request the opportunity (predetermination of the application) to engage with Councillors and request this scheme to be "called in" for committee review – IF REQUIRED.

This development cannot go ahead as submitted.

Justification why the application **should be refused** enclosed.

1.2 Recent History (Year 2025):

It must be noted; the new landowner unfortunately proceeded with their initial ground works (extensive site clearance and levelling works) last year- without any required approvals or prior consultation/ updates with neighbours.

I have issues with this given wildlife and tree protection. The land is also contaminated.

The developer proceeded to clear the site with a complete disregard for environmental impacts.
In fact, in direct contradiction to the advice from their own appointed consultants.
As discussed within.

I find the mobilisation works concluded by the developer as very odd- given the contentious history at the site – i.e. the previous landowners extensive demolishment work at the site (again, without approval or notification to residents) leading to complaints by residents.

The new landowner (developer) SB Homes is based in Slaithwaite and celebrates their presence and ongoing works within the area (see their website etc).

They could have easily engaged with/ and updated residents.

I do not think it is a huge chore to introduce themselves to residents, apply appropriate signage at the site location- importantly, in good time (with pertinent contact information)- and outline the proposed initial ground works (key dates, proposed noisy hours etc).

Noise occurrence during this time impacted my ability to work from home and enjoy downtime in my garden. I am sure it did for others.

I am sure it hampered many residents' ability to enjoy sunny days in gardens/ hang out washing etc.

This amounting to disturbing grounds containing sulphates, arsenic and asbestos.

Of further note, is the 3-tonne weight limit in place at Clough Road.

The developer has proceeded to ignore this road weight limitation and locate digging machinery, loading vehicles etc- during the 2025 site clearance duration.

2no. excavators (diggers) have been located on site throughout most of the year (and still located on the site), and my estimate is these machines easily exceed 6-tonnes [as a minimum] and likely between 8 and 12 tonnes in weight. It is very strange for the developer to ignore the weight limit that is clearly in place and clearly sign posted to the base of Clough Road.

"Not the greatest of starts"! Signage from the new landowner was eventually erected at the site – but post completion of the mobilisation/ clearance works. I ask why? Consultation is easy and effective. And valued. People can plan their work patterns etc to suit highlighted noisy hours/ impacts to road networks etc.

I feel particularly sorry for the immediate residents (adjacent property owners located on Crowther Close) who have had to deal with machinery, noise and diggers- during the site preparation/ clearance works. Most oddly, this heavy machinery has been parked close to their rear garden's boundary of the Crowther Close bungalows for months now (circa. 6 months)- impacting outlook for the Crowther Close residents. The landowner/ developer should have had the intelligence to park the machinery/ diggers furthest away from these properties during down-time months. Impacting the outlook of residents for months with large machinery – again, is not the greatest "start to proceedings".

1.3 Jan 2026 Letter Issued to Residents by the Applicant:

A letter was blindly posted 6th Jan 2026 to residents from the developer SB Homes.

The letter claims it is a "Consultation Letter" and sets out the overall development intent.

However, the scheme is now fully designed and solidified (and indeed already submitted to the LPA pre-Xmas)- and this does not allow residents to voice any pertinent considerations- to factor into the finalised proposals.

A huge, missed opportunity.

The previous planning application (withdrawn) for this site incurred many objections – and the letter issued does not address any of the previous raised 'objector concerns'.

Another missed opportunity.

The developer sending a letter post submittal SHOULD NOT be qualified as actively engaging with the local community by the LPA (Local Planning Authority).

It is simply an informative of a submitted application – not a consultation letter as titled/ claimed.

The letter sets out the development intent, oddly summarises the schemes 'merits' and concludes with contact information. The contents of the issued letter are worrying.

The letter includes a proposed site plan and table of unit returns- that amounts to a gross overdevelopment of this site. The quantities and densities hugely intensifying the land use- with evident associative impacts to the environment, highways and services etc.

The letter states the development "accords" to national and local planning policy. This statement is incorrect.

The letter claims the design is informed by the sites "industrial past". Noting a "strong and well-defined frontage" to Clough Road "reminiscent of the sites history". This claim is very weak.

Clough Road street scene as proposed and submitted- will consist of (from south to north):
gable end for unit 16 > parking bays with small landscaping buffer > gable end for unit 7 > new road access point > an alien out of keeping super apartment 'block' > terminating with an oddly designed parking zone to the top of the site impacting on protected tree locations.

It is peculiar to state that the proposals are either informed by or reminiscent of the site history. It is further odd to state the proposals have a well-defined frontage. It does not.

The frontage is simply an archetypal housebuilder layout. It is certainly NOT a "strong or well-defined frontage" as claimed in the submitted letter.

The apartment block to the north is grossly inappropriate (discussed further within) and the most worrying aspect of the proposals.

The apartment block as designed- directly impacts on existing tree locations to the northern edge of the site subject to TPO protection. The letter claims their design seeks to "protect, retain and enhance" existing trees on the site. This is incorrect and disingenuous given the clear intent to remove mature protected trees.

The proposals for the new housing estate include minimal landscaping with no valuable amenity offerings (spaces) to utilise.

The site plan provided in the letter is wholly disingenuous- as it does not include all existing trees to be retained across the site- particularly to the north and east.

I requested via email from the developer a site plan/ heat map plan of all trees that shall be removed and all trees that shall be retained as part of the proposals. The developer weakly replied via email,
"we are working with a tree specialist who is advising us in this regard"
"our brief is to minimise impact to trees where possible".
This reply is unacceptable.

All proposals should be fully formed and co-ordinated and submitted as part of the planning application – not being "worked on" in due course. I also have issues with the tree specialist report submitted- as discussed within.

The letter oddly claims the development works will "promote tree health and viability" and will "maximise the potential of the landscape". The claims are wholly incorrect. The proposed works as submitted are hugely impactful to the trees, wildlife and valued landscape.

The development of the site as submitted will unarguably impact trees and the Green Belt border abutting the site. The proposals for **any avoidance of doubt proposes to remove (TPO protected) existing mature trees**.

The claim of the developer they will "maximise the potential of the landscape" is particularly odd – as there is no dedicated green space or landscaping of any value proposed.

The proposals include retaining wall/ boundary wall proposals so dominant (as discussed within)- plus hardstanding parking finishes to the base and trunk of TPO protected trees – all that will likely lead to the loss of all such trees.

The developer is not protecting or enhancing trees and natural environment in any capacity.

Overall, the claims within the letter are wholly inaccurate.

The site plan is disingenuous, and the area schedule heavily pixelated.

The letter proceeds to note "ecological enhancements" planned for the site include nest boxes, bat boxes etc. Oddly, the letter states "can be incorporated".

The developer and design team should be confirming IF THEY ARE PROVIDED or not – and where? As part of wider proposals to manage the protection of the environment as part of careful site delivery.

The letter notes the woodland area to the east of the site is 'earmarked' for such additions.

The developer notes "holes in fences" will allow hedgehog movement.

The above noted proposals are worrying (and I believe tokenistic gestures). To maximise a density of a site with residential units- with vast mass parking- and nearing 100% hardstanding – and to concurrently claim nature and species are being catered for or enhanced – does not tally.

Any hedgehog will be prime for danger/ death- given the highways uplift brought forward by the applicant.

The site and local area include roaming deer, owls, horses, various nesting birds etc.

The applicant has not suitably appraised impacts to wider wildlife as existing (and post completion – if the development was approved and completed). Including a range of required assessments/ reports missing from the application submittal.

The letter proceeds to state highways is catered for via Clough Road and new entry road to the site; allowing for access and egress. Whilst noted, the developer should be confirming the proposals are fully highways compliant- including detailed and comprehensive traffic consultant appraisals of Clough Road (reviewing road weight limitation, detailed TRICS data etc). The submitted traffic analysis from the applicant is light and insufficient.

Affordable housing is noted to be provided at 20%. The letter claims in accordance with Kirklees Planning Policy. This is incorrect. Discussed within.

The conclusive statement of the letter is the most worrying, denoting:

"In conclusion (1) it is considered that the proposed development, due to its relationship with the site (2), its surroundings (3) and sensitive design approach (4) offers a good opportunity to provide much needed variety of housing (5) in the local area and reuse of a brownfield site (6).

(1) Concluded by whom?
Has the developer concluded a Pre App with the LPA to ascertain such conclusions?
The developer has not effectively consulted with neighbours and the community to support such stated conclusions. It is odd to provide the applicants 'conclusions' without any supportive evidence. Appear to be 'marking their own homework'.
(2) The relationship with the site is wholly inappropriate- as discussed within.
(3) The relationship with the surrounding area is deeply worrying- as discussed within.
(4) To claim the proposals are sensitive is the most worrying statement- as discussed within.
(5) Agreed, housing should be considered for this site – but not at this mass over intensification as submitted. Discussed within. Further, I have concerns regarding the claim of "variety" of housing. Also discussed within.
(6) No objection to reuse of this brownfield site.
Unfortunately, the proposals as submitted are a gross overdevelopment of this site location. They are hugely impactful and should be refused.
Discussed within.

The submitted Planning Statement by the applicant denotes [Section 2.7 Statement of Community Involvement]: "SB Homes operate an open and transparent engagement policy across the business, including regular and positive neighbour engagement throughout the planning and construction stages of their projects.

"The target area for a letter/leaflet is the neighbouring properties along Clough Road and Crowther Close to the south. Responses and comments are made to a central email account *planning@sbhomes.co.uk*.

This again is disingenuous given letter was issued AFTER the application was submitted. No neighbours were engaged or consulted pre-submittal. Further, residents facing the application site should be notified [along Brook Terrace] in addition to neighbours to north and south of the site.

1.4 Planning Application Submitted:

I am worried by the minimal information submitted by the applicant.

I am worried that there is a huge amount of key information missing.

I believe all the consultant reports submitted by the applicant are by proxy VOIDED.
This given the ecologist, arboriculturist and environmental reports- all contain site observations, samples, data and recommendations- reflecting the former site condition. All appraisals concluded pre 2025 clearance and re-levelling works.

Further, each consultant has provided recommendations within their reports – important recommendations relating to health and safety and the law- that the developer has disregarded and proceeded to re-level and dig the site. I am super confused why the recommendations of the very consultants (directly appointed by the applicant)- has been/ is being ignored.

The information as submitted (drawings and reports) is not correctly co-ordinated between the consultants/ design team.

The application fails to appraise or reference the recent withdrawn planning application for the site.
I believe intentionally- and this is further worrying.

I am worried that the LPA have deemed the submitted information to be sufficient to even validate and consult on this application.

The application **should be refused** on vast number of grounds.

1.5 Reasons to Refuse:

1.5.1 Missing information

The application is missing correct boundary information, full and accurate land ownership details (of the application site and the immediate neighbours' property boundaries).

The applicant fails to provide key existing and proposed sectional datum information.

The application materials as submitted is missing MANY key materials including but not limited to: Lighting assessments, sectional drawings (existing and proposed), visuals/ CGIs to communicate the proposals to the community, CMP Construction Management Plan, Bat Surveys, Ecology reports, Construction access management plan is submitted.

Among Others.

I do not wish to dwell on the vast information missing- and am sure case officers shall identify as such.

1.5.2 Incorrect information as submitted

Correct site information for the whole/ wider application needs to be fully qualified by the LPA.

On appraisal of the materials – the site ownership boundary seems incorrect. This will require full verification. The latest site boundary (red ownership boundary) as shown on dwg. 2517-S1-05 Planning Layout is different (varies) to the ownership boundary as showcased on previous site plans submitted by HNA Architects [See App: 2023/90157].

Further, the proposals submitted fail to acknowledge the PRoW that cuts through the application site.

Again, LPA officers shall be required to update all parties on PRoW status. Correct ownership boundary and status on PRoW is required – and in turn, shall allow for accurate design interrogation of the submitted proposals. PRoW connections adjacent too and within the site boundary- should be expressly indicated on all submitted drawings.

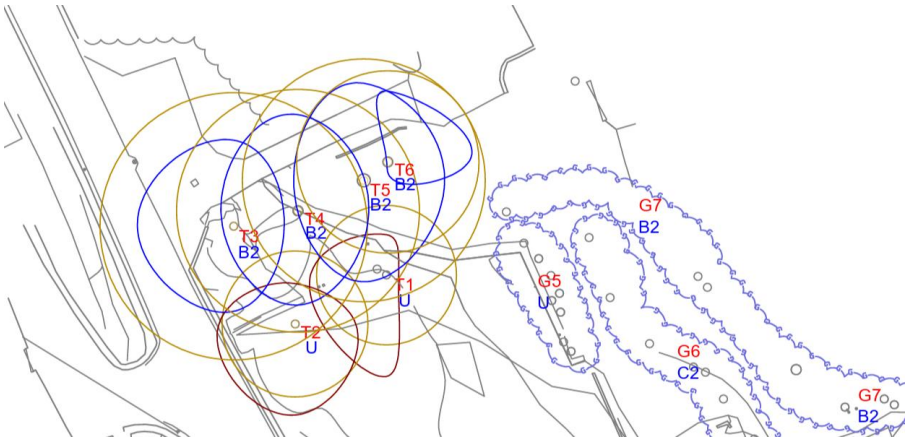
A proposed Site Plan should be in circulation with full topography, datums, TPO tree locations [including root and canopy protection zones]. Full details of existing boundary to the east of the site (Green Belt boundary) IS REQUIRED. The reports submitted simply denote such areas as 'inaccessible' and 'subject to confirmation'. This requires verification in advance of submittal- and should form important part of Structural Engineers' proposals.

Site ownership and boundary details of the immediate neighbour to north of the site (including their garden spaces) is also required – and requires addition to key drawings. This given the applicant proposes for vehicle access along an existing road that connects to this neighbour's plot. Further, verification of boundary of neighbour's plots- will also allow officers to establish overlooking constraints.

The applicant has further submitted information that is contradictory to the associative reports supplied by their very own appointed consultants. This includes TPO information (and recommendations), contamination management protocols and proposed foundation information. Among others.

Example of Incorrect Information/ Contradictory Information:

Tree Plan Extract (including tree numbering):



The developer proposes to remove mature trees to the north of the site. I believe the removal of these TPO protected trees should be resisted by the LPA. Aside, the arboriculturist is promoting Trees T1, T2 to be removed as submitted. Without any consultation with required parties.

The arboriculturist report notes Trees T3, T4, T5 and T6 to be retained.

The proposed site plan (extract below) SHOULD have the 'retained' 4no. trees included [T3, T4, T5 & T6] but indicates 3no only. Tree T4 is missing from the proposed site plan:



I believe this is not an oversight. I believe this is intentionally done - to allow for vehicle access to proposed parking bays as showcased on the plans.

The site plan as submitted does not align to the recommendations/ proposals of the arboriculturist report.

The applicant should be engaging with such bodies for all TPO protected species across the site – in advance of any submission.

The arboriculturist also notes Group G5 to the north of the site requires "Discussion with Engineers. Implement appropriate management on their advice".

The G5 group is missing from the proposed site plan.

The arboriculturist notes Group G6; "Consider removal, addressing water run off issues, removing old stonework and similar, regarding area and **new planting to extend and improve woodland cover**".

The proposed drawings submitted contain no proposals to accord to the above advice to; "extend, add new planting and improve woodland cover".

The arboriculturist notes; **"All material within TPO so advice should be sought from LPA".**

Has the applicant concluded discussions with the LPA regarding all TPO protected trees across the site? It appears not. Such advanced (pre submittal) discussions will inform TPO protection, viability of TPO protected trees, agree root and canopy protections - and only then allow any review of removals where viable (and evidenced). Feedback on hardstanding materials to base of any TPO mature trees would be (and should be) concluded. I am confident Env Health/ Tree Officers will resist such proposals brought forward and object.

The proposed location of the apartment block (and associative mass parking) to the north of the site INPARTICUARLY will undoubtedly damage/ kill many trees – and root zones and canopies of the mature existing trees (to this part of the site) not sufficiently appraised as required.

The mass retaining/ boundary walls as proposed and submitted will further damage the existing trees and adjacent woodland. The proposed piling intent for the site is not legible or showcased on any drawing materials.

The LPA should consider the trees are protected for a reason. Secondly, they protect views to and from the application site for neighbouring properties. Thirdly, many trees are bordering and contained within the Green Belt. Lastly, these trees are visually attractive. For an applicant to simply issue proposed removal without any required negotiation or consultation- I am uneasy about. It indicates to me their protection is not a primary consideration. As showcased with the 2025 site clearance works.

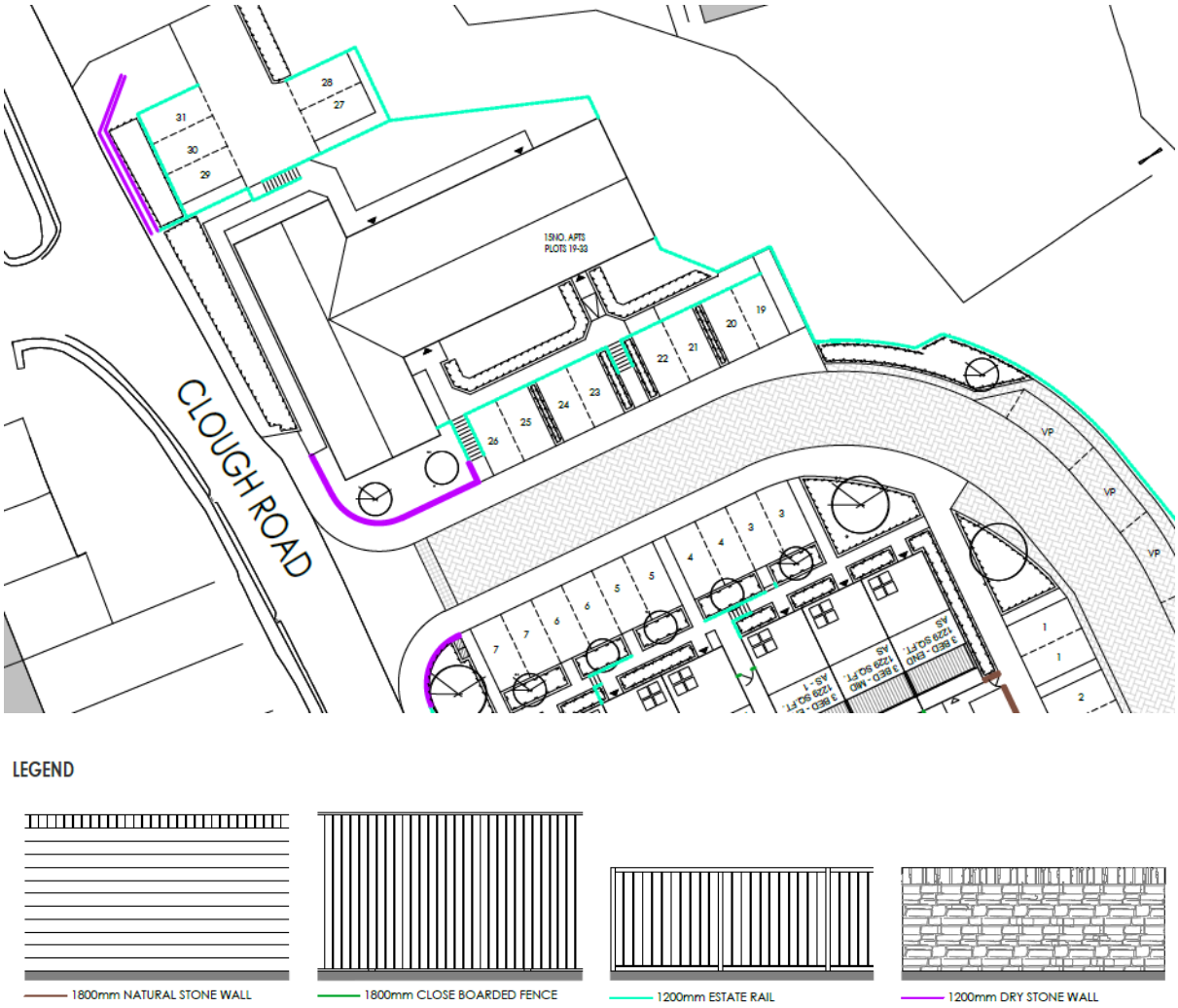
A Woodland TPO exists to the east of the site. The applicant proposals seek to add vast parking bays and retaining/ boundary walls- to this eastern edge of the site (with large hardstanding parts)- that will also undoubtably impact/ damage/ kill a large volume of species.

A full Structural Methodology Statement should be provided with regards to any existing and new retaining and boundary walls. A full Environmental Strategy Plan should be submitted to manage and mitigate impacts.

The applicant should be providing full analysis of the existing trees on site inc. species, protection status, tree health, full canopy info and full root protection zones – and put simply; be **retaining all existing mature trees** to accord to their claim that *"the design has focussed on protecting, retaining and enhancing the existing trees on the site"*- as highlighted on their letter issued to residents and within their submitted documentation.

Example of Incorrect Information/ Contradictory Information:

The applicant provides a proposed boundary information drawing. Extract below:



The applicant suggests the boundary walls range from 1200mm – 1800mm. This is wholly incorrect and disingenuous.

The selective street scene elevations submitted (that intentionally omits neighbouring context – a huge issue) clearly shows vast retaining/ boundary walls proposed to the front of the site fronting Clough Road and particularly – the rear of the site:



STREETSCENE A-A - VIEW FROM CLOUGH ROAD



*Missing Neighbour properties < application proposals **cropped** > missing bungalows Crowther Close*

The applicant should be adding neighbouring properties (massing/ key distances/key datums) for full transparency. To claim the proposals are contextual and not display the immediate context is worrying.

They should also be providing several sectional studies across the site (north to south and east to west) for full transparency.

The applicant should be including the neighbouring properties on all drawings, providing CGI visuals- and a variety of massing studies to truly communicate the intervention level brought forward.

There is no design justification included in the materials to justify the interventions (massing/ bulk etc) as proposed. They simply note the apartment block is 'reminiscent of the former mill'. This is a very weak claim. Discussed within.

The 'selective images' are cropped and doctored to present minimal impacts of the proposals submitted- and put simply, do not tally with reality.



The proposed 5 storey apartment block [four floor levels (+ roof)] is grossly over dominant to the surrounding area + ironically, the very housing proposed adjacent by the applicant (plots 1-7). Design and architectural issues/ matters discussed within.

The above elevation studies are also not accurate or representative of the existing tree types or canopies. They are photoshopped stock images- that misrepresent the site condition.

The mammoth retaining walls proposed (as highlighted) to the rear of the apartment block are hugely overbearing, and will no doubt heavily damage/ kill existing trees- and impact the green belt boundary.

A peculiar design proposal for this location.



It is evident from above elevations- vast retaining walls in the region of 8,000-10,000mm in height/ circa. 3 storeys (*heights to be confirmed – as there is no data of value on the submitted drawings*)- that is unacceptable and hugely impactful (ground conditions, noise, flood levels, impacts to Green Belt, root damage, wildlife, overlooking – etc).

This does not tally with the submitted boundary wall drawing and legend provided.

The lack of drawing information, transparency of proposals and missing visuals – will result in community members (and potentially LPA officers) being unaware of the full extent of the proposals brought forward.

1.5.3 Planning Policy

- ❖ Conflicts with Local Plan and/ or Development Plan Policies
- ❖ Contrary to Government Planning Policy Guidance
- ❖ Not Complying with Council's Policy Guidance
- ❖ Affordable Housing submitted contrary to Guidance

The applicant has submitted an application that is contrary to local & national policies and guidance.

The Planning Statement submitted, author unknown [Section 2.5] claims;
"There are no policies in the NPPF that indicate that the development should be restricted".
This statement is beyond peculiar – as the application as submitted is contrary to many NPPF policy directives.

To simply provide this statement is errored and irresponsible- nor evidenced.

LPA officers (and partnering consultees) will need some time to evidence all policies the proposals are contrary too.

I suggest the LPA also review the submitted DAS.

A Design & Access Statement is intended to provide schemes' design rational.

The submitted report (DAS) submitted by the applicant is particularly poor.

I am particularly interested why the applicant has not engaged with the LPA via Pre Application to establish agreeable/ acceptable parameters for the application site.

I am assuming no prior engagement has been concluded by the applicant with key consultees including the LPA (Pre App) as noted above- or wider consultees including Env Health, Tree Officers, Highways Department etc – given this would be well documented and discussed within the submitted DAS- if actioned and concluded.

The architect dedicates a chapter to Planning Policy [Section 1.5] in the submitted DAS- but simply lists pertinent policy considerations. The architect fails to evidence how they comply with policies (for clarity they do not).

Oddities include Page 12 of the DAS with the architect highlighting NPPF Paragraph 15:
"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a ***platform for local people to shape their surroundings****."*

I find it odd the architect and landowner has highlighted such key policies given NO PLATFORM has been afforded by the applicant- to the local community (and neighbours) to provide feedback.

The architect dedicates a chapter to Historical Context of the site and area [Section 2.1] but fails to reference the recent withdrawn planning application at the application site – that is most pertinent.

I feel deliberately as the new application **exceeds** the withdrawn application regarding unit returns, massing and densities. The latest scheme is over intensification of the site when comparable to the withdrawn application.

The architect dedicates a chapter to Architectural Context [Section 2.2] but fails to acknowledge the immediate neighbouring properties and the architectural vernacular surrounding the application site.

All analysis and key drawing materials, should be including:

- the low-level bungalows to Crowther Close [South of Site]
- the properties facing the application site at Brook Terrace [West of Site]
- the properties to north of the site at Clough Road and Brookside [North of Site]

The DAS progresses to highlight Understanding the Site chapter [Section 2.3]. Worryingly a sketch of the site is included on Page 23 that is overly simplistic review of the existing site.

The trees are misrepresented- and the site plan does not include the immediate and wider context of neighbouring properties. Chapter 2.3 is minimal and fails to acknowledge the overall site context.

Chapter 2.4 contains historic photos (taken in advance of the developer clearing the site and forming a temporary path at Clough Road/ full fencing of the site). They are not representative of the site current state. Importantly all the reports submitted (ecology, trees and contamination etc)- all review the historic site condition preclearance by the developer- and (by definition) are voided.

The developer has ODDLY proceeded to dig, clear and re-level the site – post site investigations by various consultants- and I ask **DOES THIS DEEM ALL THE REPORTS AND DATA CONTAINED WITHIN AS VOID?** I wish for LPA officers to confirm.

Chapter 2.5 of the DAS; Opportunities and Constraints firstly, has many observations collated collectively on a sketch site plan- that is overly messy and arguably difficult to understand for some.

Secondly, the observations are errored and missing key considerations.

The architect summarises key constraints as; ground conditions, topography, TPO's and Green Belt woodland abutting the site.

This is a huge understatement of the site constraints.

Pertinent constraints include Wildlife, Highways matters, 3-tonne weight limitation for Clough Road, neighbouring architectural mixed vernacular (inc. massing heights), overlooking potentials, and [north of site] shared access road and interface with the neighbouring property- all ignored by the architect. Among MANY other considerations.

The architect fails to acknowledge root protection zones for principal trees to the north of the site. They also fail to acknowledge the visual screening that principal trees at the site afford neighbours. Public Right of Way pathways are missing from all drawing materials.

The architect incorrectly notes the existing threshold fronting Clough Road as "hard edged". It is not.

The architect notes "view opportunities" to south of the site towards the viaduct- without any acknowledgement that these carry **substantial overlooking concerns** for properties along Crowther Close.

Chapter 3.1 Design Concept is in most part legible- but sadly includes claims that are incorrect.

To claim the proposed layout “creates a pedestrian friendly environment” is weak.

The claims regarding proposed landscaping “softening” the site and creating a “greener environment” is also weak.

The proposed landscaping brought forward is minimal and tokenistic- and adds no real architectural/ visual value.

The visual impact as proposed along/ fronting Clough Road is hugely disappointing- with gable end after gable end- terminating with an incongruous out of keeping apartment block proposed to the north of the site.

The architect notes opportunities for ‘landmark’ and ‘feature buildings’, particularly along Clough Road – but this is not executed as submitted/ proposed.

They are proposing a housing typology ‘variation’ as a feature, without analysis of any notable architectural features or visual interest. To claim the variation in house typology “creates visual interest”, and/ or “strengthens the relationship between the development and its surroundings” is wholly disingenuous – nor evidenced.

The apartment building is noted by the architect as a “clear focal point” and a “gateway to the development”. This is a peculiar statement and worrying – as the apartment block is a huge monolith, architecturally bland, incongruous, clearly overdevelopment, and contrary to policy.

It is also architecturally weak (with no contextual relationship to neighbouring properties or architectural vernacular of the area). The apartment block should be rejected in its entirety.

The apartment block proposed location and massing size (considering TPO protected trees, neighbouring property interfaces etc)- is also not deliverable.

The construction of the apartment block as proposed will compromise tree canopies, tree root protection zones- and no doubt exasperate existing highways difficulties along Clough Road.

Officers should refer to the submitted ground condition appraisals and request detailed methodology with regards to piling intent, contamination management, flood risks etc.

The supplied information submitted is also not coordinated between the various consultants. To state items shall be confirmed “in due course” or “developed”/ “to be agreed” is insufficient.

The architect proceeds to claim in Chapter 3.2 The Layout “every aspect of the design has been carefully developed in response to the site’s physical characteristics to support a high-quality residential environment”. This statement is wholly incorrect. The site analysis concluded by the architect fails completely to appraise impacts to existing residents and in my opinion – the submitted drawings, lack of massing studies, visuals/ CGIs are selective and misleading.

The architect proceeds to claim the proposed “33 new dwellings are arranged in a way that responds sensitively to the site’s existing vegetation”, that “constraints have informed the layout”, and claims “the development sits comfortably within the landscape” while “maximising natural views”. All such claims are again incorrect. To remove and impact TPO protected species, impact wildlife, clearly overdevelop and overlook neighbours etc- and conclude all constraints have informed the design- is again, disingenuous.

The architect notes “the proposal includes a mix of building types and heights, comprising a four-storey ‘landmark’ apartment building alongside two-and-a-half-storey dwellings”.
“The taller apartment building provides a focal point within the site, while the stepped heights of the houses help to mediate the development’s scale”.

The above claims are again simply incorrect.

To claim this scheme is contextual and designed to mediate scale and impact is beyond confusing. The intentional lack of massing studies, lack of overlooking analysis and no regard (or analysis) of proposed massing and overbearing impacts- particularly to Crowther Close properties – makes such claims by the architect as laughable.

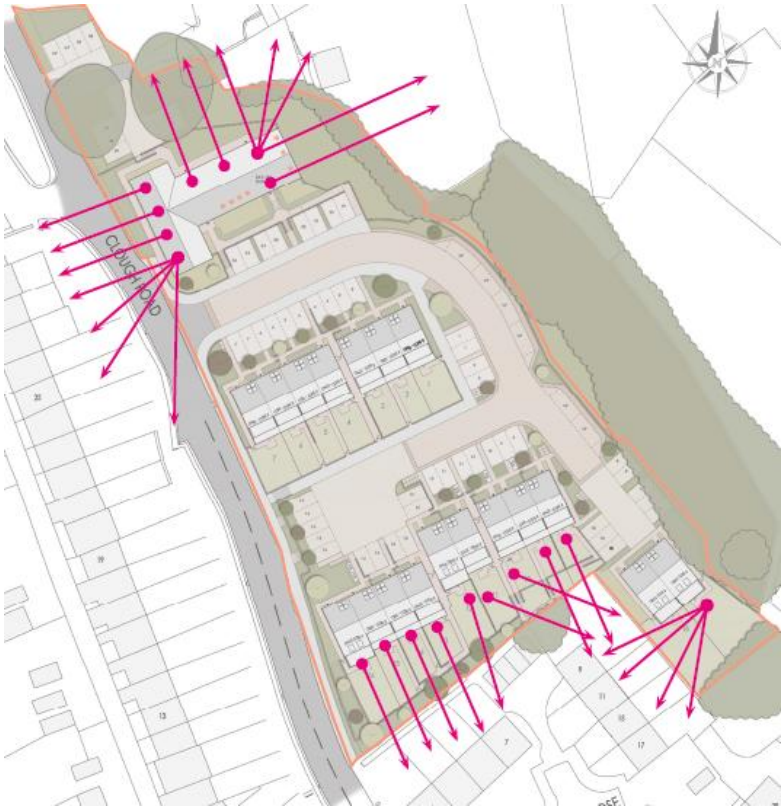
The architect notes “the two-and-a-half-storey dwellings have private terraces that are carefully positioned to make the most of the site’s elevated position and offer long-distance views across Slaithwaite. These elevated outdoor spaces enhance residential amenity while reinforcing the strong relationship between the development and its surrounding landscape”. The architect fails to appreciate the impact of the oddly placed proposed terraces (and overall massing) equates to **substantial overlooking** of neighbouring plots. For ease I markup of the reality of the proposals.

The architect has located terraces to the rear of the homes to the south of the site (all overlooking neighbouring properties garden space and rear facades). The markup drawing also showcases the mass overlooking issues relating to proposed apartment block.

The applicant should be providing full and comprehensive analysis of all overlooking potentials.

The units proposed are NOT carefully positioned and DO NOT regard impacts to neighbours AT ALL.

Key section studies across the site are missing and would instantly identify such issues.



MASS OVERLOOKING ISSUES

The architect notes “the proposed layout creates a clear and legible streetscape with prominent building facades, vibrant public spaces and a clear hierarchy of streets, courtyards and open spaces”.

The architect claims are again incorrect.
There are no public spaces offered (a missed opportunity) – simply a hardstanding street.
To be classed as “vibrant” is a head scratcher.
There is neither any ‘open spaces’ nor any ‘courtyards’.

The architect notes “this layout promotes ease of movement and orientation, facilitates natural surveillance and fosters a safe and welcoming atmosphere for both residents and visitors. The design of shared spaces encourages opportunities for social interaction, while the privacy and amenity of individual dwellings are carefully maintained”.

The architect above claims privacy and amenity are protected – is again, incorrect.

To claim a vanilla housebuilder street of mostly hardstanding and mass parking- promotes social interaction or is vibrant- is again super confusing.

The architect concludes “Overall, the proposal successfully balances respect for the local character and sensitivity to the landscape with the delivery of a high-quality, functional and sustainable residential development. By combining traditional architectural features with contemporary design principles, the scheme provides an attractive, resilient and adaptable extension to the existing settlement that can meet the needs of current and future residents”.

The conclusion above is deeply deeply worrying and wholly misleading.

The design does not respect neighbouring properties or local character at all.

Design is of course subjective – but to conclude the proposals are of a high quality, attractive etc- I disagree with.

This is a copy and paste (of unit types) housebuilder application- for a site – that is led by maximised intensification/ overdevelopment- and in turn profit.

For the applicant to conclude the proposals ‘meet the needs of current residents’- is simply insulting.

Examples of failure to comply with policy/ guidance:

SPD Particulars

Principle 1 states: *Developers **are expected** to draw upon the range of tools available to help secure high-quality design for residential development, from the outset of the development process. Developers should work closely with the Council and use the most appropriate tools to secure high-quality design. Securing high-quality design through the planning process:*

Pre-Application Advice NOT ACTIONED
Support from Architects ACTIONED and Landscape Architects NOT ACTIONED
Community Engagement NOT ACTIONED
Statutory Consultees Advice NOT ACTIONED

The applicant HAS NOT engaged/ concluded a Pre App for the site. The applicant has drafted proposals with no community engagement concluded. No Pre App with pertinent bodies including Highways, Env Health, Tree Officers. Among Others. The applicant clearly fails to comply with the directives of SPD Principle 1.

Principle 2 states: *New residential development proposals will be **expected to respect and enhance** the local character of the area by: Taking cues from the character of the built and natural environment within the locality. Creating a positive and coherent identity, **complementing the surrounding built form** in terms of its **height, shape, form and architectural details**. Illustrating how landscape opportunities have been used and promote a responsive, appropriate approach to the local context.*

Note: It is proven the proposals fail to respect or enhance the character of the area. In fact, the proposed massing, building typologies- wholly contrast with the existing architectural vernacular. The applicant has identified 'planting areas'- but offers no defined green space - that either respects or connects with the existing site area. The applicant clearly fails to comply with the directives of SPD Principle 2.

Principle 3 states: *Developers are expected to **clearly identify** and map out site opportunities and constraints in the Design and Access Statement. This can help understand what constraints impact upon the developability of the site and ensure that they are fully embedded into the design of the site and that the site can be developed to make the efficient and effective use of land. A Site Framework will identify the purpose of each part of the site and help guide the site's development, setting the development parameters early in the planning process.*

The applicant clearly fails to comply with the directives of SPD Principle 3. The Design & Access Statement submitted fails to clearly demonstrate the full (and most pertinent) constraints of the site. Key constraints missed as highlighted enclosed. The submitted proposals is NOT an efficient or effective use of the land. A Site Framework (identifying sections of the site applicable and not applicable for development) is completely missing. The applicant simply concludes- the whole of the site area is applicable for full development. This is incorrect and disingenuous.

Principle 4 states: *Net development density is expected to achieve at least 35 dwellings per hectare, though higher densities are supported in areas in or adjacent to town centres which are well served by public transport and to secure more sustainable forms of development. Densities lower than 35 are only permitted in line with Local Plan Policy LP7. The location of the site is important in terms of the requirement for car parking provision, on-site open space provision and the type of housing required in the locality.*

The applicant clearly fails to comply with the directives of SPD Principle 4. The Design & Access Statement should be setting out the parameters for the site as defined in Principle 3 – OPPORTUNITIES AND CONSTRAINTS- and confirming 'optimum returns' for the site; to inform data in response to Principle 4. Factoring in pertinent constraints to suit. Put simply, a site plan that identifies areas of the site applicable for interventions; factoring in Tree protection, land contamination constraints, overlooking and sun path etc. Only then – can the optimum unit returns to suit the site location be agreed.

Principle 5 states: *Buildings should be aligned and set-back to form a coherent building line and designed to front on to the street, including corner plots, to help create active frontages. The layout of the development should enable important views to be maintained to provide a sense of places and visual connections to surrounding areas and seek to enable interesting townscape and landscape features to be viewed at the end of streets, working with site topography. The arrangement of buildings should consider* ***maintaining privacy and residential amenity****. Effective boundary treatments should be used to form defensible space and delineate between public and private realm. Buildings should be arranged to take account of weather and microclimates.*

It is indisputable the proposals brought forward fails to accord to the directives of SPD Principle 5. The orientation of the proposed plots fails to return any active frontages – to Clough Road (public realm). The proposals fail to add any views of interest. The vanilla application of soldiered semi-detached properties- adds no visual interest (or any architectural expression). There is no inventiveness in utilising and working with existing topographies. The applicant is simply maximising development (unit) returns. Views to and from the site are ignored.

There is no valuable distinction between the plots other than a change in unit type, and this is a huge, missed opportunity. Policy 7.13 notes low quality and intrusive boundary treatments can have a negative visual impact on the public realm; particularly when high fences where rear gardens face on to the street. The applicant proposes fence lines and gable ends fronting the primary frontage of the site (Clough Road) that is unacceptable and contrary to policy and guidance. Views obscured by vegetation, high walls and fencing are resisted by policy – and the applicant is clearly proposing as such. Policy 7.14 and 7.15 cover architectural expression such as corner plot differentiation and building frontages. The proposed design submitted is monolith and repetitive with no architectural expression.

Building frontages dominated by hard landscaping and car parking that is within the plot and fronting on to the street **should be avoided** as this can result in dull and vehicular-dominated streetscapes. The applicant oddly designs in direct contradiction to such key design policies.

Principle 6 states: *Residential layouts must ensure adequate privacy and maintain high standards of residential amenity, to avoid negative* ***impacts on light, outlook and to avoid overlooking****.*

The applicant clearly fails to comply with the directives of SPD Principle 6. The proposals (massing, location of plots, window locations, odd upper terrace additions) has an **unacceptable impact** on neighbouring plots. It is clearly **overlooking**.

The applicant should be testing and proving (via Principles 3 and 4) the optimum development locations for any units across the site – and thereafter, proving NO IMPACTS to neighbouring properties (overlooking) – with effective site analysis to evidence accordingly.

Principle 7 states: *The **integration of** green infrastructure and **accessible open space** must be considered early in the design process by assessing: the site's context; the ability to make connections with wider green infrastructure networks; and the multi-functional role green infrastructure can perform. **Proposals should retain existing features within the site,** such as valuable trees, natural wildlife habitats and landscape features. Green infrastructure can be provided through building features such as green roofs and green walls and through the design of streets to include street trees, and trees within residential plots and open spaces. **Open Space**, particularly for recreation, should be located at the heart of the site and designed to help create identity.*

The applicant clearly fails to comply with the directives of SPD Principle 7. The submitted proposals INCLUDE NO ACCESSIBLE OPEN SPACE, any recreation space of value, a complete lack of connectivity to the wider green infrastructure and pathways (despite a huge opportunity to do so) and most worryingly- the works directly impacts protected trees and green buffer zones within and adjacent to the application site.

A tokenistic planting of a tree 'per plot' is not landscape design. The applicant misses an opportunity for dedicated open space/ recreation space – and I continue to ask on such estates "where do the children play?". The proposed site plan is mass hard landscaped and prioritising vehicular movement. A change in paving materiality does little to promote recreation – it simply denotes to a driver too slow down.

Principle 8 states: *The transition from urban to open land should be carefully considered where development is located on the edge of the urban area. Proposals should demonstrate how the new development makes a **positive contribution to the character** and function of the landscape **through sensitive siting and good design**. For all sites in **elevated** areas, the appearance in the wider landscape should be considered and with applicants demonstrating how development **respects** the topography of the site and its surroundings.*

The applicant clearly fails to comply with the directives of SPD Principle 8. The proposals for a host of reasons DO NOT positively contribute to the area. There is no sensitive citing of the residential units (simply an attitude to build fully across the site) or any effective landscaping. The site is elevated and the applicant does not demonstrate how the proposals respect either the topography or the surrounding area as promoted. The applicant proposals are a direct contradiction of this principle and dismisses policies.

Principle 9 states: *Proposals are required to provide net gains in biodiversity, with ecological enhancement integral to the design of the development. At the outset of the design process the wildlife habitat network and Habitats of Principal Importance should be considered in addition to **protected species** and the maintenance and management arrangements for any wildlife spaces need to be clearly set out.*

The applicant clearly fails to comply with the directives of SPD Principle 9. Officers will note net biodiversity gains should be considered at an early stage to ensure biodiversity enhancements and habitat creation are incorporated – and most importantly, wildlife habitat network is safeguarded and enhanced.

The proposals brought forward simply state biodiversity considerations that are non-site specific and simply a box ticking exercise.

Effective site analysis would establish a comprehensive strategy for preserving and enhancing the existing vegetation/habitats – and identify stringent mitigations to ensure and evidence – no significant ecological harm by: in the first instance seeking avoidance of loss of existing habitat; secondly by providing adequate mitigation; or as a last resort, through compensatory measures. The applicant fails to evidence as such.

Constraints and opportunities can be sought at the pre-app and the necessary constraint surveys can be undertaken to inform design development. I feel the inclusion of bat boxes and swift boxes is simply an afterthought for this application. A generic inclusion applicable for any site. The applicant had an opportunity to submit an inventive site-specific design response. The submitted documentation is woefully minimal in exploring options for the overall site.

Principle 10 states: *The site layout should make effective connections to existing walking and cycling links and take opportunities* ***to create new connections****. Site access will recognise the different needs of people walking, cycling and using cars and prioritise the needs of people walking and cycling, to encourage sustainable modes of travel. In order to contribute towards more people using sustainable modes of travel walking and cycling links should be safe, convenient, direct and accessible; and residential development may provide opportunities to improve connections via the Kirklees Core Walking and Cycling Network.*

The applicant clearly fails to comply with the directives of SPD Principle 10. ProW pathways ignored. Wider connections to existing pathways ignored. The scheme as proposed is one singular road (cul de sac esq design) with maximised parking opportunities.

Walking and cycling are not prioritised in any capacity. The outrageous level of hardstanding reflective of vehicular priority.

Principle 11 states: *Provide inclusive spaces that meet the needs of pedestrians, cyclists and children and ensure streets are well integrated into the development. Streets must be able to serve emergency and service vehicles, maintain low vehicular speeds and* ***successfully integrate on-streetcar parking.*** ***Creative design*** *should ensure natural surveillance and movement help mitigate the risk of crime and street layouts are attractive with street trees and landscaping.*

The applicant clearly fails to comply with the directives of SPD Principle 11. The proposals submitted prioritises vehicular travel with an inappropriate level of parking across the site.

Children play opportunity is in the confines of rear fenced gardens or dangerously at street level. The street design is monolith and simply aids access to and from the site by vehicle.

An agreement with Highways should have been sought at the outset [as encouraged by policy] to avoid 'cul-de-sac' esq design. The proposals are dominated by a highway layout that provides a bland and uninspiring environment to live; in contradiction to local and national policy.

Where streets are designed for parking and servicing; buildouts, verges and soft landscaping should form part of the streetscape to mitigate heavy hard landscaping. The applicant simply denotes singular tree planting zones as submitted – that fails to soften the dominant hardstanding street scene. CGI visuals should evidence as such but not concluded or submitted.

Principle 12 states: At the outset of the development, applicants should identify the need for car parking having considered a range of measures to reduce private car-use into the design of development and through travel plans such as promoting car sharing and car clubs, providing safe and convenient cycle infrastructure and parking, providing safe and convenient access to bus stops and providing improved passenger facilities and where appropriate working with bus operators facilitate bus services through the site; and seeking enhancements to existing bus services.

No travel plan has been submitted.

Car parking provision should not dominate street frontages (as submitted) through parking arrangements that place cars at the front of all dwellings.

Parking should be provided in a mix of different formats including on- streetcar parking, parking in mews courts, parking courtyards and under-croft / underground as well as within the curtilage of properties. The applicant fails to offer mix of parking.

Where car parking is included within the curtilage of a dwelling, creative design solutions should ensure that car parking can be accommodated at the side of buildings or to their rear to avoid dominating the street scene. The applicant fails to accord. The inclusion of car parking should avoid dominating the streetscape and the frontage of development, there are a range of different ways car parking can be included but not be over-dominant.

The range of policies regarding parking and options are completely overlooked by the applicant.

On-plot car parking at the front of a property for all units results in bland streetscapes and should be avoided/ refused. The applicant fails to consider (as policy promotes) – How is car parking been integrated into the site to ensure that it is not visually dominant?

The applicant clearly fails to comply with the directives of SPD Principle 12.

Principle 13 states: *Applicants should show how different materials which are prevalent in the vicinity of the site have been taken into account in the proposal. Consider the use of locally prevalent materials and finishing of buildings to reflect the character of the area. A simple palette of materials, appropriate to the site's context, should be identified early in the development process to help give the site a coherent identity. The embodied carbon of the material in terms of the environmental impact of its production, transportation and thermal performance should be a prime consideration in the development process. The detailing of the public realm on larger schemes can help form part of a cohesive public art strategy for the site; and help create a rich identity supporting the distinctive character of Kirklees.*

The applicant clearly fails to comply with the directives of SPD Principle 13. The applicant uses stone facades. Noted. That is the extent of materiality to match local vicinity. The proposals lack architectural detail and level of differentiation required. The immediate and wider area has many detailing features that could be easily echoed/ integrated. The proposed units are simply a copy and paste of typologies from other SB Homes developments – that bear no identity to this specific site location.

Principle 14 states: *The design of windows and doors is expected to relate well to the street frontage and neighbouring properties and reflect local character in style and materials. Innovation for energy efficiency is encouraged, particularly for maximising solar gain to allow for passive solar construction.*

The applicant clearly fails to comply with the directives of SPD Principle 14.

Principle 15 states: *The design of the roofline should relate well to the site context, including topography, views, heights of buildings and the roof types. Consideration should be given to the pitch of roofs, the inclusion of dormer windows, provision of green/blue roofs, the role of roofs in providing outdoor space and ensuring that the design of roofs does not allow for easy climbing access to upper floor windows.*

The applicant clearly fails to comply with the directives of SPD Principle 15.

The housing units are simply copy and paste typologies from other developments that bear no identity to this specific site location.

There is no differentiation between plots, there is no regards for datums from local context. The list is vast.

The proposal of apartment block is completely out of keeping with local area (rooflines and key datums).

Principle 16 states: *All new homes should aim to be accessible and adaptable homes to meet the changing needs of occupants over time in accordance with Building Regulations.*

The applicant clearly fails to comply with the directives of SPD Principle 16. No evidence of adaptable homes submitted.

Principle 17 states: *All new houses should have adequate **access to private outdoor space** that is functional and proportionate to the size of the dwelling and the character and context of the site. The provision of outdoor space should be considered in the context of the site layout and seek to maximise direct sunlight received in outdoor spaces. Apartment development can provide outdoor spaces through balconies, though communal terraces and gardens may be more appropriate.*

The applicant clearly fails to comply with the directives of SPD Principle 17.

No evidence of suitable amenity space or reference to the local area submitted.

The applicant should vary garden plots to introduce differentiation and architectural interest- supported by dedicated open recreation space and connectivity to walking paths/ woodlands etc.

The housing units are simply copy and paste typologies from other developments that bear no identity to this specific site location.

The apartment size, unit returns and amenity associated is completely contrary to standards.

Kirklees Council's planning policy does not specify a mandatory minimum garden size in square meters; instead, it requires the outdoor space to be "adequate" and "proportionate to the size of the house".

There is no differentiation of amenity relative to house size (bedroom returns) as submitted by the applicant.

UK garden size requirements vary- but planning policies appraised collectively; often suggest minimums such as 40-45 sqm for 1-2 bed homes, 60-65 sqm for 3-bed, and 80+ sqm for 4+ beds.

The applicant should be stringently identifying full methodology for amenity spaces and a hierarchy between homes of varying sizes/ bedroom returns.

So as one can see, the development IS SIMPLY UNVIABLE and contrary to most policy guidance.

The above is SPD review alone.

To review NPPF, local and national guidance and policy will be a mammoth task and result in an objection submittal that would take an eternity to digest.

I can confirm the proposals falls foul of most directives and policies.

1.5.4 Issues with Reports Submitted:

Transport Report:

The Transport Report submitted notes “there are good opportunities for walking and cycling locally, with pedestrian and cycling infrastructure linking the site to local amenities and facilities in Slaithwaite. Trips to and from the proposed development site can, therefore, easily be undertaken by sustainable modes of travel, thus minimising the use of the private car”.

However, the proposals prioritise the car with mass parking spaces and hardstanding.

The claims of the report do not tally with the submitted design.

TRICS data as submitted is optimistic and concludes the proposals have a negligible impact – as such no further assessments undertaken.

This is flabbergasting given the local community have highlighted issues with Highways impacts as a pertinent matter.

The applicant should have consulted Highways pre-submittal- and provided a full and comprehensive transport report (plus associative reports; travel plan etc)- given this item is a particular issue for residents.

To simply note “we conclude the proposals have a negligible impact – as such no further assessments undertaken” is unacceptable.

The TRICS data does not break down each plot/ car allocation per plot/ types of parking to accord to policy etc- and fails entirety to review neighbouring plots car data, the lack of pedestrian pavements adjacent to the site, and importantly, the CLEAR restrictions/ constraints of Clough Road.

The traffic report is minimal, simplistic, and does not provide fully comprehensive TRICS data- to allow for sufficient appraisal.

The applicant should be meeting Highways and LPA officers (Pre App) to discuss Clough Road weight limit in the first instance.

This should be informing the viability of ALL works at the application site- and inform all associative traffic analysis.

The applicant clearly fails to address the primary highways concerns of residents.

1.5.4 Issues with Reports Submitted:

Ground Conditions Report/ Information:

The reports provided by the applicant explicitly note Flood Risk.

The consultant notes temporary drainage works to prevent flooding to Crowther Close to the south of the site "will need to be investigated- and the source of the flooding will need to be dealt with as part of the proposed site works".

However, the applicant does not provide any proposals to accord.

A full CMP Construction Management Plan plus associative studies and data- should capture such matters.

Such works need to be FULLY concluded in advance of submittal.

Contamination Matters:

The consultant report highlights:

- Based on the chemical results obtained it is considered that there is currently a moderate risk to end users from ground contamination on-site: i.e. the residential site users (new homeowners).
- The report further notes there is a moderate risk to construction and maintenance workers from the redevelopment of the site due to the presence of asbestos. However, the developer has proceeded to clear the site without the required protections.
- The report notes it is "considered unlikely" that there is a risk to groundwater and controlled waters from existing contamination on site. This should be evidenced and proven.
  The report highlights the open watercourse adjacent to the site and recommends that temporary works plan is put in place to ensure that no contamination from the development of the site enters the water course.
  There are no materials submitted regarding this item nor engagement with the Environment Agency. This is unacceptable.
- To the consultant's credit, they suggest further works be concluded including methodologies, method statements and validations be sought.
  The applicant has failed to action and provide the suggested materials.
- To the consultant's credit, they highlight required approvals and engagement with Kirklees Council Environmental Health Department, Warranty providers, The Environment Agency, Highways and Utilities etc.
  The applicant has not actioned accordingly.
- Reports highlight where any foundations are located near existing or proposed new trees, their foundations must be sited below the root growth zone.
  No tree root zones are provided.
- Reports highlight new below ground services infrastructure (piping etc) requires protection from contamination.
  No sufficient information provided.

The reports are limited and missing key information and data.

This aside the applicant fails to action the recommendations of their very own consultants and have proceeded to clear a site- that is contaminated and poses a danger to site operatives and local residents.

1.5.4 Issues with Reports Submitted:

Ecology Report:

The Ecology report lists recommendations at the outset of the report, including:

- A Nesting Bird Survey **required**.
  NOT PROVIDED
- That Bat Activity Surveys are **required**.
  NOT PROVIDED
- An **Ecological Clerk of Works** present during any works to check for protected species.
  NOT PRESENT DURING SITE CLEARANCE WORKS
- An Invasive Species Method Statement is **required** in relation to the Cotoneaster on site.
  NOT PROVIDED
- A Biodiversity Enhancement Plan (BEP) to advise on post-development enhancements.
  NOT PROVIDED
- Lighting installed as part of the development will be in line with Guidance Note 08/23
  LIGHTING ASSESSMENT/ OR PROPOSALS- NOT PROVIDED
- Consultation with the local council is **required** to detail potential impacts to this habitat and incorporate mitigation measures into the development.
  NOT ACTIONED

All the above surveys, reports and consultations highlighted by the ecologist consultants- should be concluded **in advance** of the planning submittal.

The applicant materials- provides no assurance with regards to the above listed items.

The applicant should be providing full information and mitigation proposals where required.

The applicant has merely submitted their scheme it seems- with a hope such above matters could be confirmed in due course? or possibly conditioned?

The LPA should be ensuring the works do not impact ecology (including TPO protection). The submitted documentation is severely insufficient – and (a reoccurring theme) contradicts the recommendations of their own appointed consultants!

What is particularly shocking is the ecologist has clearly identified protected species activity for the application site (in line with site survey June 2025) including amphibians, nesting species etc.

Despite clear identification of potential habitats, confirmed species and site wide required considerations – the developer has proceeded to clear the site – ignoring all the above advice and directives.

The developer has commissioned an ecologist to survey the site over the Summer of 2025- and thereafter cleared the site, including all potential habitats/ species. WHY?

I find it shocking that a consultant confirms that species are evident on site and the developer to brazenly ignore and flatten the site.

I do not agree with a number of conclusions by the ecologist (many conclusions highly debatable) – but placing this aside – the ecologist is clearly noting nesting birds, foxes, roe deer, hedgehog and so on. This all ignored by the landowner/ developer.

Further, the odd site clearance works concluded over the summer months of 2025; is in direct contradiction to the recommendations of the ecologist.

For example, the consultant suggests “no works between March and end of August” to ensure protection of nesting birds.

I am genuinely scratching my head to why a developer would instruct an ecologist review of the site- and completely ignore all circulated recommendations.

This applies to contamination advice, ecology advice, tree advice.

1.5.5 Design

There is a huge amount of information to justify why this application SHOULD BE REFUSED from a design and architectural perspective. Primary Considerations below:

Unacceptable Over-Intensification of the Site:

The applicant proposes to return 33no. new units across the site. Denoted as 3–4-bedroom homes plus selection of 2-bed apartments. This is a gross over development of the site in question.

The previous application APP: 2023/90157 (withdrawn) proposed 23no. new dwellings.

For the new designer and landowner/ developer to increase densities when compared to previous scheme is very odd.

App 2023/90157 was withdrawn – known to be relating to the mass objections and an indication the application was to be recommended for refusal.

App 2023/90157 represented an over intensification of the site (among other issues).

Any new application for the site should be supported by accurate data to reflect true optimum unit returns for the site. Factoring in site conditions, road networks, full and comprehensive analysis of opportunities and constraints. There is no effective site analysis to inform optimum returns for the site (factoring in existing properties, walking paths, buffer zones for trees, eliminating overlooking etc).

To review the previous application (and issues) that proposed 23no. dwellings – and return with a new application and uplift to 33no. dwellings is perplexing.

The applicant has merely designed to maximise unit returns across the site- with little no regard for detailed site analysis.

There is a distinct lack of appraisal of Supplementary Planning Document (SPD) for housebuilders.

The housing units are simply copy and paste typologies from other developments that bear no identity to this specific site location. Contrary to policy.

Unsuitable Architectural Intervention:

The applicant proposes an apartment block to the north of the site that is wholly inappropriate, non-policy compliant- nor befitting of the architectural vernacular of the area. The intention to add an apartment block for this site should be removed from consideration by the applicant in its entirety.

The site is befitting of houses – sensitively designed to suit site conditions.

The remainder of the proposed site as submitted- seeks to deliver banks of 'semi-detached' housing units. The houses proposed are 3/4 beds- and on appraisal of the minimal submitted materials; proposed as 3/ 3+ storeys in massing height [GFL, 1FL, 2FL + Roof].

It is clear the applicant has not reviewed the architectural context of the area – of which most properties are 1-storey and 2-storeys. I invite LPA officers to review wider area to establish an accurate understanding of the architectural (massing) context.

Oddly, the applicant discounts a comprehensive review of the historic withdrawn application- where massing, building heights, overlooking and dominant scales- were all highlighted as concerns- and submitted as reasons for objection.

Effective consultation with residents could have addressed such key concerns. A missed opportunity.

This site should return homes that tie in with the local vernacular. Simply denoting materiality (as stone) is akin to neighbours (as submitted) is insufficient. Analysis of scale, materiality and massing – MISSING.

The applicant is proposing a vanilla copy and paste of 'housebuilder' homes with no architectural differentiation. It is generic and boring. Proposed roofscapes are repetitive- and lacking any architectural delight or differentiation.

Crowther Close properties are wholly OVERLOOKED. Amenity space to Brook Terrace and Clough Rd properties also overlooked.

The proposed mass concreting over of this site and removal of TPO protected trees is unacceptable.

The LPA (pertinently) should focus on the pedestrian experience when viewed from the public realm (from Clough Road) – and note a series of fences, gable ends and hardstanding surfaces- with a large apartment block to the north of the site – as submitted; is wholly unsuitable.

Non-compliance:

Affordable Housing is proposed for the site – exclusively via a percentage of rental apartments. This is a repeat delivery model of the developer.

The applications odd overbearing 'apartment block' is presented as a 'landmark' for the site by the architect. It is clearly not.

This aside, the applicant claims this allows them to accord to policy- regarding the delivery of affordable units. Whilst noted – this is non-compliant.

Policy denotes affordable housing (policy 6.2) should be indistinguishable from market housing by considering the following:
the architecture of the affordable homes in terms of the quality of materials and finishing, the ***architectural details, style, and space standards****, the landscaping and on-plot car parking, the layout of affordable dwellings* ***should be dispersed throughout the site*** *in smaller clusters,* ***avoiding large groupings*** *of affordable dwellings together that may reinforce social exclusion. Affordable dwellings* ***should be well integrated*** *within the site layout and not located at specific areas* ***at the edges of sites****.*

The applicant proposes an apartment block that is FULLY distinguishable from all other parts of the site. The proposed affordable units are fully concentrated (large grouping) and exclusively located at the northern edge of the site. To summarise, the applicant proposals are WHOLLY CONTRARY TO POLICY.

In my view, the applicant SHOULD be exploring CIL CONTRIBUTIONS that could contribute to the upkeep/ upgrade of the road system and water ways, rather than squeezing in non-complaint apartment units not befitting of the site location.

Parallel, amenity and parking for the apartment units are not compliant. Nor correct.

Parking proposed across the site as proposed- is mammoth- and when reviewing the proposals – incorrect. House type E, where the "home office" could be used as an extra bedroom (would then increase the number of bedrooms to 4 for this house type)- which would generate a requirement for 3 off-street parking spaces. The submitted site layout drawing only shows 2 off-street parking spaces for this property.

The errors and non-compliance are littered throughout this application.

1.5. CONCLUSION

The landowner is a family run business providing housing across the borough and employing people. This should be applauded. It is very commendable.

I do however have concerns the housing brought forward is once again – a "copy-and-paste" exercise of dwellings (with very minor tweaks) from other SB Homes locations. Slaithwaite is now being 'bordered in' with SB Homes house typologies including to the South (Lingard's Rd development), to the West (Empire Works estate) etc. A degree of variation in architectural aesthetic would be welcomed.

The addition of copy and paste housing units to this site location (northern edge of the village) is too much – the architectural returns at this site location (Clough Rd) requires variation to add visual interest.

To summarise, there is a risk that the wider area is being whitewashed/ diluted by the insertion of repetitive typologies, aesthetics, materiality.

The LPA should welcome more architectural diversity and inventiveness for this application site. Especially given bordering of the Green Belt. I would champion more innovative solutions with regards to materials, style and typologies to introduce more architectural interest- rather than yet another 'infill location' with off the shelf repetitive house typologies. I also believe the applicant has missed an opportunity to add to the village vernacular- via innovative landscaping, particularly to the site boundary edges.

I personally believe the site should return circa. 12- 15no. dwellings (preferably, market/ family homes); to (a) comply with policies and (b) ease potential burdens on services and infrastructure. This unit range aligns to overall m2 of the site location [factoring in evident constraints].

The inclusion of an apartment block is not befitting of this location- and should be resisted.

12- 15no. attractive and innovative dwellings (designed innovatively) will command healthy £-returns providing comfort to the developer.

The LPA should refuse the application or invite the applicant to withdraw (and reconsider and in turn re-apply).

I do not feel an extension of time will allow the current proposals to evolve to a suitable resolution.

Any application should have all required reports as part of a submittal (a robust DAS, full site analysis, comprehensive highways and contamination appraisals, wildlife appraisals, full flooding analysis, full traffic analysis, among others) – all I believe this could easily be agreed/ or at least set out- via set of Pre Application meetings/ conclusions.

Most importantly, the applicant should consult with stakeholders INCLUDING residents.

Engagement will allow involvement, input and agreed resolutions.

The applicant has showcased this site on their website as COMING SOON. However, failed to include residents and key stakeholders in informing the design development.

Nimbyism is not a factor here. I feel lots of people wish to see this site utilised. However, the design submitted; fails to accord to local and national policies- and hugely impacts the existing neighbours and site area.

The unknown answers require verification, including flood risk to neighbours, wildlife impacts, water contamination, general contaminations, viability given Clough Road weight and layout restrictions. And so on.

The current proposal is undercooked and missing a vast amount of critical information. I still question how the application was even validated.

I fully support use of this site for residential dwellings– subject to the correct considerations and acceptable returns (dwelling numbers and design). SUPPORTED BY REQUIRED DRAWINGS, VISUALS, REPORTS AND DATA- TO CLEARLY EVIDENCE INTERVENTIONS ARE BEFITTING OF THIS LOCATION.

The application brought forward summarised is:

- Plainly an overdevelopment of the site.
- Over intensification
- Clearly to the detriment of neighbouring properties (outlook, overlooking, amenity impacts).
- The scale of the proposed housing (housing types, storey heights) wholly inappropriate.
- Out of keeping with architectural vernacular of Clough Rd/ Brook Terrace/ Brook Terrace.
- The proposed 'apartment block' is completely out of keeping with the site location.
- Clearly to the detriment of the Green Belt.
- Hugely impactful to ecology and wildlife
- Contains many Highways issues.
  Among others.

This application has several missed opportunities:

- To carry out effective consultation with residents.
- Lack of Architectural Delight.
- Wildlife Protection/ Enhancement lacking.
- Lack of new street lighting.
- Lack of valuable landscaping as part of the scheme.

I hope that the LPA issue a refusal and invite the developer to revisit the overall proposals. Promoting Pre Apps, consultation with the community and clear evidence (and documentation) to support any new application.