

FAO Mr Victor Grayson,
Kirklees Planning Service,
Civic Centre 3,
PO Box B93,
Huddersfield,
HD1,2JR.

Denby Dale,
Huddersfield,
HD8,8QX,
Tuesday, 15th April '25,

Re Planning Application 2024/62/93458/E

Dear Mr Grayson,

I would register an Objection to the above application for development off Cumberworth Lane Denby Dale; application 2024/62/93458/E being but the most recent referencing some portion of land between Leak Hall Lane and Cumberworth Lane headlined previously in public media, 'Disasterous Denby Dale planning saga continues.....'. Whilst readily acknowledging significant difference of the application currently under consideration and the rejected 2024/92168, of which the Authority may retain some record of my objection and comments, in my view there remain important deficiencies including some commonalities.

1. There is no attempt to provide adequate data supporting the proposed 'ground stabilisation and remediation strategy ;

(a) They claim contractors' opinion used in support of a previous planning application, or for some other purpose, that no realistic prior assessment is feasible given the nature of the project, attempting thereby to cover a lack of useful data. It may be concluded that the applicant fears objective data as an inconvenient burden potentially threatening to their proposals.

(b) They prefer not to estimate the quantity of material to be removed off-site, nor the amount of 'grouting' necessary to their intentions for 'stabilisation'; previous application vaguenesses included the nature of the land and the extent and purposes of levelling.

(c) They express confidence in earlier assessments of water flows and drainage but make no attempt to explain the drainage consequences extensive 'grouting', which must be assumed to impact both run-off and water retention on site, nor consequences for the spring and sink holes.

(d) There are references to historical assessments of coal on-site, but not to their demonstrable reliability, nor the relevance of such assessments to the very different purposes of the application.

The inference would seem to be that the applicant view as unreasonable any expectation

that adequate objective data be supplied to a planning committee of the Authority.

2. There are other related weaknesses:

(a) There can be small confidence in suggestions of levels of construction traffic generation given the inadequate descriptions;

(b) The site is said to be 'on the edge of the village', near a 'Wesleyan Methodist Chapel', a listed building, yet 'Wesleyan Methodist' is a term of historical reference pre-1934 Methodist Union, which may even be preferred for purposes of the application as taken to imply a low use venue rather than the reality of one used by local residents most days each week, and around 100 metres of the major road junction, near most village shops and the popular village pub. It may be understood as 'on the edge' only so far as the commercial centre extends predominantly immediately adjacent to the A636 passing through the Dale, yet it is near the major junction and very near to that centre.

(c) There are references to gradients using averages over standard measured distances, rather than practical numerical descriptions of difficult sites and specific angles of descent;

(d) Similarly, there are mentions of sight lines, both over property and at road junctions, the latter for traffic purposes, but they are not represented in terms of detailed outcomes of practical observations of potential specific difficulties for development under consideration. In my view there may be some case for a roundabout to enable traffic flows especially on Wakefield Road/Cumberworth Lane, except that the gradients involved could challenge the effective mobility of some vehicles in poor winter weather. Similarly, there are no records of observations of traffic problems on Cumberworth Lane/Wakefield Road and the proposed site vehicular exit. There is a need for adequate data, both on current traffic flows and the implications of increased vehicle movements following completion of residential development.

(e) It seems apparent from the plan that 'ground stabilisation and remediation' create a need for steps to enable access to and from the public footpath adjacent to the site; yet there is no discussion of walling/embanking to secure the current level of that path.

3. There seems to be little data directly applicable to planning criteria such as 'a special case mixed development', for whilst there is mention of proportions of owner-occupation/rental property there can be no adequate justification of property proportionate to categorisations of local needs, in my view.

4. There is no explanation of changes in site levels and their implications for existing properties near the site. Surely, construction for example of a twelve metre high property on a three/four metre embankment within twenty metres of an existing dormer bungalow may impact on light and garden privacy, which may have become customary over time. There would seem to be implications for at least one block of the proposed development. I suggest it is scarcely credible that a proposal for a three/four metre embankment with

retaining walling necessary to a single dwelling development would be acceptable if , thereby, it raised by almost the height of a single storey the base level of the proposed development above existing adjacent property.

Finally, the applicant seems to be confident of approval, almost regardless of the evidential basis of the application, claiming that it should be approved as consistent with national Government policy on house-building as there is no current approved local plan for development within Kirklees. I would suggest it is an inadequate application for not only is data inadequate to support proposals for construction, and no case is offered to support the claim that the application should be accepted beyond a simple statement of opinion, but there are sheets of details of possible refuse collection movements, which presumably could be inferred from widths of proposed service roads with other outline planning and therefore not relevant to the requirements of such an application; so that it becomes a merely a means of increasing bulk. There seems to be no considered view of off-site infrastructure impacts of the development , except brief mention of bus stops and the train station. It may be considered remarkable that there are no data on school places nor employment patterns, given a requirement to consider the wide impacts of development planning within the context of any such application. Could it be that the whole matter of a 'ground stabilisation and remediation strategy' is little more than a device to represent the current application as radically different from previous proposals for residential development between Leak Hall Lane and Cumberworth Lane that have been refused, especially as the applicant prefers not to invest time and money sufficient to establish sound criteria backed by objective data to enable informed assessment by the Authority.

Yours sincerely,

PS. Perhaps you could suggest a re-submission with a customary usage of 'where' or 'were':

"Easy drainage culvert/ditch could be retained/cleared/reinstated 'were' required..."

or

"Easy drainage culvert/ditch could be retained/cleared/reinstated 'where' required...."??