DC Admin

From:
Sent: 24 July 2025 14:19
To: DC Admin
Subject: Planning Application REF 2025/91370 - OBJECTION

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36 Gynn Lane

Honley

HD9 6LF

Planning Application REF 2025/91370

1. I am responding to your invitation to respond to an outline planning application for the building of up to 50 houses on land at Gynn Lane, Ref 2025/91370

2. I wish to ***object*** strongly to the proposed development because it will contribute to increasing known flood risk to existing properties in Gynn Lane. This contradicts guidance to local planning authorities in the National Planning Policy Framework (2024) paras 170-172, which states clearly that every new development should be "made safe for its lifetime, without increasing flood risk elsewhere" and also contradicts para 4.2 of the Kirklees Local Plan which says that new housing allocations "should not increase flood risk exposure"

3. The Planning Authority must be aware that this development increases housing on Gynn Lane/Hall Ing by 30%. The water and waste generated by this development will increase strain on current drainage infrastructure. The plans for the proposed site's drainage prepared by Huddleston and Haigh have already been deemed "unacceptable" by Yorkshire Water who have established stringent conditions for foul water proposals. Yorkshire Water's general guidance for new allocations is based on a "preferred hierarchy" for surface water disposal, with SuDS and infiltration as its preferred methods of drainage. But Kirklees "currently has a policy of not accepting SuDS apart from soakaways" and these have not been deemed acceptable for this site. Yorkshire Water do not accept SuDS to an open sewer because it cannot accept land drainage, and as the technical reports show infiltration is problematic because of the underlying geology. Yorkshire Water's least preferred option is to discharge water via an attenuation system into Ludhill Dyke, running to the North West of the site. I consider this to be highly problematic.

4. The Local Flood Plan for the Calder Catchment Area says para 2.4.2 that much of the local flood risk comes in, "settlements along the Holme…(which) suffer from the consequences of rapid surface water run-off from the uplands and fields… formal drainage systems are sparse… the industrial heritage of textile centres

has left a historical legacy of stone culverts carrying surface water through… residential areas". Ludhill Dike is the ordinary watercourse into which the surface water run-off is shown to drain by the proposed plan. The Environment Agency Map of flood risk from surface water shows the Dike and the stone culvert adjacent to number 30 Gynn Lane, to be an area of high risk of flooding from surface water with a greater than 3.3% chance of flooding. I have lived on Gynn Lane for 4 years and have talked with neighbours who have experienced flooding in 2010, August 2011, July 2015,March 2018, 2019, February 2022, October 2023. The floods were caused by a combination of failure of the roadside drainage system to cope with heavy rain and run -off, rainfall and drainage overpowering the culverts and drainage systems, and the backup of river water from the River Holme at the junction of Gynn Lane. In papers relating to the previous planning application H/584, the Local Flood Risk Manager states, : "Ludhill Dike is not modelled, and will carry some risk in the vicinity of the channel… There are known flood incidents downstream of the site from Ludhill Dike… These have occurred in several places. It is believed the culverted sections of the watercourse may have contributed to this" He goes on to say that "this will be a limiting factor" in terms of "improving flood risk to the wider community", and therefore contradict national planning guidance.

5. The Local Flood Plan states, para 2.5.7 "Developers have a vital role in ensuring effective local flooding risk management by avoiding development in areas at risk of flooding" While the land owner does demonstrate convincingly that the greenfield site will not flood, he fails to show how the flooding risk to existing residential development will be improved by the development, and in my view fails to demonstrate that it will not be made worse by the development.

6. In my view this is a critical issue and a material planning consideration. Planning permission should not be given to this greenfield site upstream of a residential area at high risk of surface water flooding until it has been demonstrated clearly that flood risk elsewhere has been improved. This will require demonstrable evidence that the run-off rates of surface water from a heavily developed site carry less risk than those currently discharged from a traditional greenfield site, and that the discharge of water from the houses into Ludhill Dike will lead to a reduction in the risk of flooding to existing and mature residential developments. Yorkshire Water's response casts severe doubt on this.

7. In a final and more general point, it is shocking for residents to see evidence presented by a developer which does not stand scrutiny by expert bodies. Yorkshire Water have described the Drainage Statement as "unacceptable". The Lithos report raises questions of risk surrounding old mining works, but cannot provide advice to the developer about how this risk can be mitigated. The report on traffic flows which suggests a site which has capacity for over 130 cars will only discharge 14 at peak times, is clearly risible. The heritage report directly contradicts a report commissioned for Kirklees Council simply to fit the development narrative. Kirklees Council evidence suggests there may be concerns about access for refuse trucks. Other correspondence casts doubt on the veracity of the scales on some elevations which reduces the apparent impact of the housing on the landscape. I sincerely hope the Planning Committee will seek to gain independent assurance on these issues before making any decision which may have negative and detrimental impact on the surrounding neighbourhood and the safety of existing property and infrastructure.