Planning Application
REF 2025/91370 - OBJECTION

1. This response is with respect to your invitation to comment on the outline planning application of up to 50 houses on land at Gynn Lane Ref 2025/91370.

2. I strongly object to this proposed development because I think there has not been sufficient evidence of a full risk assessment, including and addressing serious concerns by expert bodies as well as residents, with regard to several significant areas of concern, and I feel that neglecting to do so would put a significant number of existing properties, residents and infrastructure at risk as well as the newly proposed ones.

3. There are serious concerns about the provided reports, plans and statements. For example, the traffic report suggest that only 14 cars would impact at peak times when there would be a capacity of around 130 cars, surely this is an erroneous estimate and it would be good to see the full statistical analysis of this claim. The proposed access to the development alone should, in my opinion, be completely revisited from a safety and capacity point of view e.g. Kirklees Council evidence suggests that there may access to refuse trucks and many other long wheeled- and heavy vehicles which don't seem to be adequately addressed in the proposal. The Lithos report raises indicates risk of surrounding past mining but offers no advice on how the developer can mitigate this risk which could be substantial- if not downright dangerous- to existing properties as well as new ones, the coal authority response makes certain recommendations to ensure the safety, should the site go ahead but these will be lengthy and extremely costly endeavours and may still pose significant risks to existing properties (as tests have shown in the past, from talking to affected property owners). The Drainage Statement has been described as "unacceptable" by Yorkshire Water, more on that later, as this I think is the most severe of all the issues with the proposed development. The heritage report contradicts a report commissioned by Kirklees Council simply to seemingly fit the development narrative. Some of the elevation scale drawings seem to be deceptively short, giving an impression of a lesser visual impact on the surroundings. I am not sure whether sufficient testing has been done on preserving the stability of the railway embankment with the proposed excavations for the dwellings near it.

4. My main concern and reason for a strong objection from reading the reports and consulting residents on Gynn Lane and Hall Ing is that the proposed development will contribute to the increasing and known flood risk to existing properties. The development of this site would increase housing on Gynn Lane and Hall Ing by 30%. This will make a significant contribution and increase the strain on the current water, surface water and waste/foul water infrastructure which is already struggling to cope in heavy weather. 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 method of drainage. However, Kirklees "currently has a policy of not accepting SUDS apart from soakaways" and these have not been deemed as 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 geological structure. Yorkshire Water's least preferred option is to discharge water by way of an attenuation system into Ludhill Dyke, running northwest of the the site. This surely is highly problematic.

5. The Local Flood Plan for the Calder Catchment area states in paragraph 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”. Being a relatively new resident at Gynn Lane, I have already seen the heavy surface water running down Gynn lane and this is just during “normal” rain. Through conversations with neighbours and residents further down on Gynn Lane, I have been made aware some houses have been flooded in 2011, 2015, 2018 and also the playing fields flooding at the bottom of Gynn Lane. Ludhill Dyke seems to be the ordinary watercourse into which the surface water run-off is shown to drain by the proposed plan. The floods seemed to have been caused by the existing system of culverts and drainage just being overwhelmed in addition to the back-up from the river Holme. I have been made aware that in a previous planning application (H584), the local Flood Risk Manager states, and will carry some risk that “…Ludhill Dyke is not modelled and will carry some risk in the vicinity of the channel…There are know flood incidents downstream of the site from Ludhill Dyke… There have occurred in several places. It is believed the culverted sections of the watercourse may have contributed to this” He continues with “ this will be the limiting factor” in terms of “improving flood risk to the wider community”, and therefore contradict national planning guidance.

6. The proposed significant increase in housing on Gynn Lane must surely contribute to the already known flood risk to existing properties. This contradicts guidance to local planning authorities in the National Planning Policy Framework (2024) paragraphs 170-172, stating clearly that every new development should be made “safe for its lifetime, without increased flood risk elsewhere”. The Kirklees Local Plan also sates that new housing allocations “should not increase flood risk exposure” (paragraph 4.2). The Local Flood Plan states that “Developers have a vital role in ensuring effective local flooding risk management by avoiding development in areas at risk of flooding” (para 2.5.7). There seems to be no evidence or survey by means of simulation or other measures that demonstrates that this substantial site will not increase the already significant flood risk. There should be demonstrable evidence that the run-off rates of surface water from such a heavily developed site as in the proposal carries a lower risk than those currently discharged from the greenfield site, and that the risk to existing properties. I cannot see how this is possible given the current lack of evidence addressing this issue.

7. I do believe that this planning application leaves too many questions unanswered and that the risks to existing properties and the safety of current and future residents has not sufficiently and satisfactorily been explored. Therefore, in my personal opinion, I think this application is fairly pre-mature and requires far more research and proposed feasible solutions. It is therefore that I object strongly to this application at this time and I do hope that the Planning Committee will take my comments into consideration and seek more assurances and evidence before making a decision which at this time would likely have a detrimental impact on the area in question.