



I OBJECT to this outline application. The proposal is unsustainable, dangerous, and contrary to critical planning policies. The harm it causes outweighs any benefits.

The most significant objection is the site's location within a Source Protection Zone 1. This aquifer feeds Shepley Spring, a vital economic asset to Kirklees. Granting permission for this development places the facility under an existential threat. Construction activities (excavation, piling) in an SPZ1 pose an unacceptable risk of turbidity and contamination. Furthermore, the proposed infiltration of surface water runoff (SuDS) from a housing estate introduces urban pollutants (oil, microplastics, chemicals) directly into the catchment of a food-grade water source. The risk of irreversible contamination to this aquifer (and the subsequent closure of a major business) is a material consideration that cannot be mitigated by standard conditions. I trust the Council has fully consulted the Environment Agency regarding the risks to the SPZ1 and will defer to their strict guidance on groundwater protection.

I strongly dispute any claim that this site represents "Grey Belt" or "Previously Developed Land" simply due to the presence of minor agricultural structures. The vast majority of the 4.98-hectare site is open, productive agricultural land that serves the Green Belt purpose of preventing urban sprawl. This site was not allocated in the 2019 Local Plan. Developing it now is premature and undermines the plan-led system. The release of this land should only occur through long term planning process, not via cynical and speculative applications.

The proposed access via Eastfield is functionally unsafe. Eastfield is a quiet residential road, not a distributor road. It lacks the geometric width to safely accommodate heavy plant machinery and HGVs. They cannot navigate the tight residential turns without mounting pavements, posing a direct danger to pedestrians and existing residents and schoolchildren.

110 homes will generate approximately 600 daily vehicle movements. The junction with the main road (A629) already suffers from poor visibility and congestion. Adding this volume will severely compromise highway safety near a school.

The developer's claim that the site is sustainable due to Shepley Station is misleading. The Penistone Line is physically constrained by single-track sections, limiting service to just one train per hour. Furthermore, the station is not fully accessible. Platform 1 is reached only via uneven steps, excluding wheelchair users and parents with prams. Reliance on "creaking" infrastructure that fails inclusive design standards is not a valid justification for Green Belt release.

Furthermore, the "Biodiversity Net Gain" claimed by the developer is a theoretical calculation. In reality, the development replaces an established, mature field ecosystem likely hosting foraging bats, ground-nesting birds, and hedgehogs (a priority species), with so-called "managed" green spaces that offer far less ecological value. The disturbance to these wildlife corridors is irreversible.

This proposal threatens a protected water source, compromises highway safety on a small residential street, and threatens mature trees and complex wildlife on the Green Belt. These are substantial material planning considerations. I respectfully request that the application be REFUSED.