

## PLANNING OBJECTION

**Plan Ref:** 2025/92776

**Site Location:** Land at Eastfield, Shepley, Huddersfield, HD8 8HB

**Proposal:** Outline application, with all matters reserved, for residential development with associated open space, landscaping, drainage infrastructure, acoustic mitigation, and associated works.

- See page 13 to help the Case Officer cross reference the objections made here against the Kirklees Local Plan. I have also included a helpful Office Decision Summary to aide in the assessment of how this planning application goes against the Local Plan. - TLDR

### 1. Core Objections Summary

Objections to planning application 92776 on the grounds of the following:

- The proposed one-way system will create traffic issues for the main road.
- Access to the site is off a minor side road.
- The site is not on the Kirklees Council Local Plan and is currently greenbelt/farm land.
- There is concern that the development will affect the spring water that feeds the Shepley Spring business.
- It will affect Shepley Spring and their operations, causing a loss of local employability in the area, as well as affecting the unique water quality of their world-renowned products.

### 2. Traffic and Highway Concerns

#### No Traffic Consultation

No Traffic Consultation report has been submitted.

#### Existing Road Capacity and Bottlenecks

Notice the 2 pictures below. The plans submitted by the developer conveniently miss out the residential area of houses which the access to the site requires. These houses already have multiple cars parked up and along the streets and forcing this into a one-way traffic road will significantly cause buildup and congestion to an already congested village.

- **Picture B – The Knowle (junction with Abbey Road):**  
Huge Ice Valley lorries drive through here multiple times a day. The width between the houses is not more than 2 cars, presenting a significant bottleneck. The extra traffic generated by this development would cause serious access problems for all the people in the new houses, and every day they would have to contend with the industrial activity happening near Shepley Spring (also known as Ice Valley).
- **Picture A – Lee Drive:**  
This will act as the main access point to get to the housing development. There are houses stacked up alongside both sides of the road where residents park their cars. In addition, cars mount the curbs here. All this will be a significant bottleneck to get to the Eastfield development.



### 3. One-Way System Impact

It is believed there will be a one-way system in place which will mean residents of the existing community will now have to follow the one-way system, which is not currently in place.

### 4. Impact on Shepley Spring / Ice Valley

The developer claim the local housing will somehow boost the local community. However, if Shepley Ice Valley can no longer sustain its operations due to encroaching on their operational space where their bore holes are SPZ1, then this will negatively affect the local economy.

Shepley Spring is one of the most important employers for the local community, with over 150+ staff.

### 5. Pressure on Local Services and Infrastructure

Banks claim that investing in Shepley will mean it remains attractive. However:

- Doctors' appointments are already at capacity.
- The schools are progressively getting fuller.
- The tiny village Co-op (where I used to work) will no longer be able to keep up with demand.
- There will be extra congestion caused by cars on the roads thanks to this development.

**Why Shepley?**

- New housing developments in Shepley will help communities to thrive and help boost the local economy.
- Investing into Shepley will ensure it remains one of the most attractive villages to live in across Yorkshire.
- The development will deliver a play area for children and areas of green open space, rich with biodiversity for the public and wildlife to use.
- Shepley provides the unique opportunity for Banks Property to deliver high quality, modern living whilst being able to deliver a high level of affordable housing on site, to help deliver the much-needed homes in Kirklees.

**How will this residential development help “boost” the local economy when Shepley Spring the main employer in Shepley will be forced to end operations?**

Eastfield

Site boundary

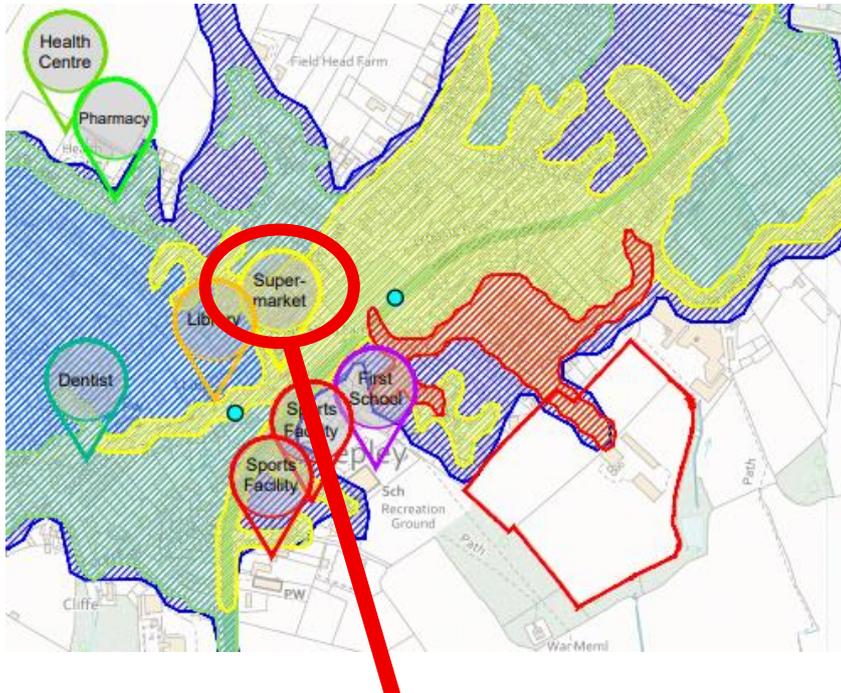
### 6. Biodiversity Claims

They claim it will be rich in biodiversity, yet they are aiming to remove the natural land that is nearby. This is a net decrease in biodiversity.

## 7. Misrepresentation of a “Supermarket”

Take a look at the Grouped Plans and Elevations [id 1108380]. They claim there are ample amenities in the area including a “supermarket”.

This so-called “supermarket” is in fact a small village Co-op store. I used to work here in 2016 and it is far from a supermarket like Morrisons in Waterloo. It only has the bare essential items for the village.



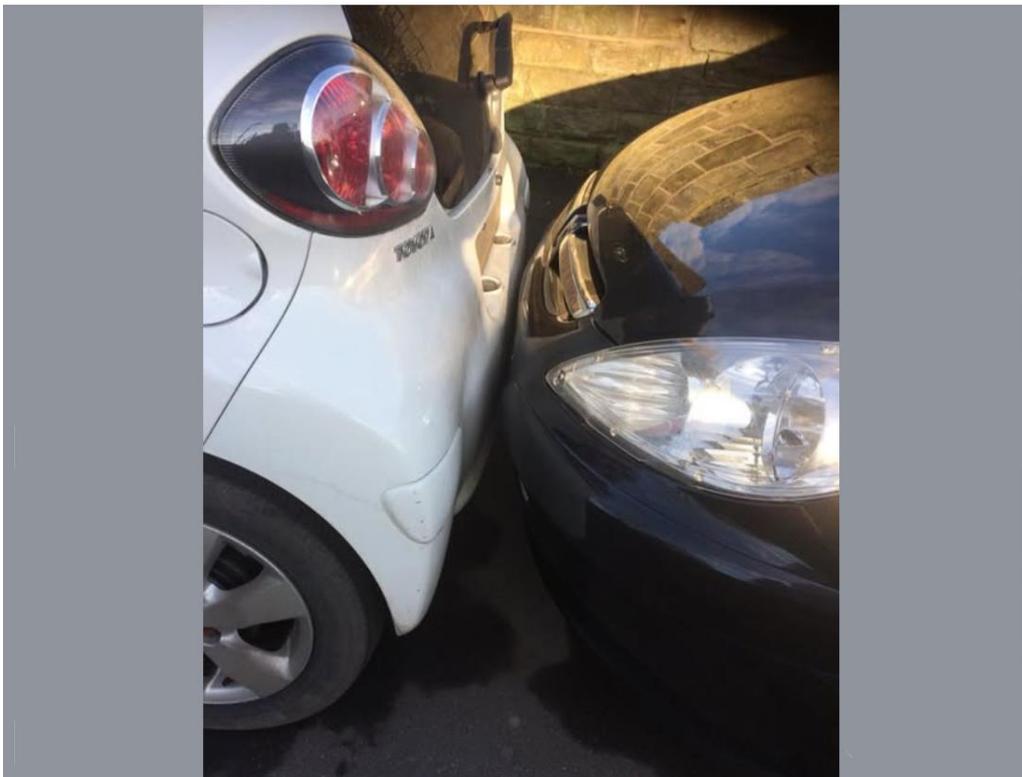
**The developer describes this as a “supermarket”**





**Congestion is frequent causing poor access for buses and lorries. Many cars park outside of the roads. No mention of this in the plans.**

Why did someone think it was acceptable to park there car so close to my daughters car today up Firth street making it impossible for her to get out. No one can say whe... [See more](#)





Anonymous member

12 December 2024 · 🌐



**Station Road...**  
**Parking = joke 😬**  
**The double parking, possibly by station users, is ridiculous 🤦🏻**

👍 6

2 comments

👍 Like

💬 Comment

📄 Send

## 8. School Capacity Concerns

The picture taken from the Consultee Responses [id 1112823] suggests that Kirkburton Middle School is **already at capacity of 501 places**. It even predicts that in the years 25 to 27 there will be a decrease in numbers. This should be investigated, as if there is an increase in housing in the area, any children that live there will need to find alternative middle school arrangements.

The same applies to Shepley First School. It predicts that there will only be 7 places available in the coming year of 2026. Will the developer restrict how many children will live at the new properties in Eastfield? How can this be mitigated?

There are proposals of 110 houses, combined with the 100+ houses already built in the area in the last year. This adds significantly more demand for the local schools, which are already close or near to maximum capacity. Children will be forced to attend schools further afield, meaning a solid and reliable transportation strategy must be in place.

Secondary Provision									
School	PAN	Year Groups	Net Capacity	Current NOR	Forecast NOR				
					25/26	26/27	27/28	28/29	29/30
Kirkburton Middle	167	3	501	502	498	497	501	501	501
Shelley College	360	3.63	1457	1279	1283	1289	1278	1278	1278

Capacity for this school is capped at 501, it is currently at 498.

Primary Provision									
School	PAN	Year Groups	Net Capacity	Current NOR	Forecast NOR				
					25/26	26/27	27/28	28/29	29/30
Shepley First School	30	6	180	172	173	178	179	180	180

Capacity for this school is capped at 180, it is currently at 173.

## 9. Waste Collection Authority Requirements

No gradients steeper than 1:12 or steps from storage area to BCP.

## 10. Analysis of the Transport Document

The document contains several logical weaknesses that undermine its conclusions:

- It repeatedly relies on superseded PPG13 guidance.
- The claim that the site has “a good level of accessibility” is based almost entirely on simple distance measurements rather than qualitative factors such as gradients, lighting, footway continuity or PRow usability.
- Assertions that residents “will not be reliant on the private car” contradict the limited bus and train frequencies identified elsewhere.
- The Travel Plan’s mode-share baseline is derived from an unjustified averaging of incompatible 2011 and 2021 Census datasets.

- Trip-rate monitoring logic is inconsistent, using mismatched peak hours and falling back on TRICS rates that do not measure behaviour change.
- Several benefits, such as long-term habit change from newsletters or cyclist suitability based solely on low-speed internal roads, are overstated without evidence.
- Claims of broad accessibility ignore disabled access constraints, such as partial step-free provision at Shepley Station.

Overall, the Travel Plan's targets, accessibility assessments, and anticipated behavioural outcomes are asserted rather than robustly demonstrated.

## **11. Construction Traffic and HGV Safety**

The AMA Framework Construction Management Plan General [id 1108443] states:

### **3.2 Site Access / Egress**

“3.2.2 A 16.5m HGV as the largest type of regular construction vehicle has been tracked between the site and the A629 via Lea Drive which demonstrates this can access and egress the site including cars parked on the highway along the proposed route.”

While the height of the lorry is considered, in cases where there are bottlenecks such as in Photo B, it can be argued that the lorries will be competing with Shepley Ice Valley lorries in order to pass by.

## **12. Green Belt Policy – NPPF Reminder**

Proposals affecting the Green Belt (Paragraph 153):

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. “Very special circumstances” will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

## **13. Coal Mining and Ground Stability Requirements**

No development shall commence until:

- a) A scheme of intrusive investigations has been carried out on site to establish the risks posed to the development by past coal mining activity, and
- b) Any remediation works and/or mitigation measures to address land instability arising from coal mining legacy have been implemented in full.

Prior to occupation, a signed statement by a suitably competent person must confirm that the site is safe and stable.

#### 14. Archaeological Investigation Requirements

A programme of archaeological fieldwork must be undertaken to fully evaluate the archaeology on the site. The geophysical survey recorded anomalies that do not match current boundaries or ploughing patterns. Some areas masked by magnetic disturbance should also be tested.

#### 15. Highway and Drainage Design Conditions

Please arrange for the inclusion of the following conditions:

1. Before development commences, a scheme detailing the location and cross-sectional information together with proposed design and construction details for all new retaining walls adjacent to the proposed adoptable highway must be approved by the Highway Authority in writing.
2. Before development commences, a scheme detailing the location and cross-sectional information together with proposed design and construction details for all new surface water attenuation tanks/pipes/manholes within the proposed highway footprint or influence zone must be submitted and approved.

See Kirklees Highways Structural Procedures for certification requirements.

### A reminder to the case officer of the NPPFF for Green Belt

Proposals affecting the Green Belt 153. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. 55.

***“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.’”***

# DIRECT KIRKLEES LOCAL PLAN POLICY CONFLICTS – GREEN BELT REFUSAL

See below where I have summarized my points against the local plan to show where the conflicts.

## **LP19.1 – Green Belt: Presumption Against Inappropriate Development**

### **Relevant Objection:**

- “The site is not on the Kirklees Council Local Plan and is currently greenbelt/farm land.”
- “Inappropriate development is, by definition, harmful... and should not be approved except in very special circumstances.”

### **Policy Position:**

The Kirklees Local Development Plan confirms that:

- *Inappropriate development is, by definition, harmful to the Green Belt and should not be approved unless very special circumstances exist that would outweigh the harm.*
- The **essential characteristics of the Green Belt are openness and permanence**, and harm to either weighs heavily against approval.

### **Policy Conflict:**

No “very special circumstances” have been demonstrated. The proposal is therefore in **direct conflict with LP19.1 and national Green Belt policy.**

## **LP62 & LP63 – Protection of Green Space, Biodiversity & Natural Character**

### **Relevant Objections:**

- “They claim it will be rich in biodiversity yet are aiming to remove the natural land that is nearby. This is a net decrease in biodiversity.”
- “Currently greenbelt/farm land.”

### **Policy Position:**

The Green Belt is protected because it:

- Safeguards the countryside from encroachment
- Prevents urban sprawl
- Protects wildlife habitats and visual amenity

The Local Plan further states:

- *Development proposals that would result in the loss of valuable green space will not be permitted unless an assessment shows the green space to be clearly surplus to requirements.*

### **Policy Conflict:**

The proposal represents a **direct loss of agricultural land and biodiversity**, in clear conflict with LP62 and LP63.

## **LP6 – Spatial Strategy & Brownfield-First Development**

### **Relevant Objection:**

- “The site is currently greenbelt/farm land.”

### **Policy Position:**

The Local Plan establishes a strict land release hierarchy:

1. Brownfield land
2. Greenfield land within settlements
3. Urban extensions
4. **Detached Green Belt sites only in exceptional circumstances**

### **Policy Conflict:**

The Eastfield site is **detached Green Belt farmland**, placing it at the **lowest level of acceptability** under LP6.

## **LP7 & LP18 – Protection of Rural Employment & Water Environment (Shepley Spring / SPZ1)**

### **Relevant Objections:**

- “Concern that the development will affect the spring water that feeds the Shepley Spring business.”
- “Encroaching on their operational space where their bore holes are SPZ1.”
- “Loss of local employability... over 150+ staff.”

### **Policy Position:**

Green Belt policy only supports rural business where development:

- Is carefully designed
- Does not harm existing operations
- Does not cause environmental damage

Environmental protection policies also apply to **water environment safeguarding**.

### **Policy Conflict:**

Any threat to a **protected SPZ1 water source and a major rural employer** directly conflicts with LP7 and LP18.

## **LP10 & LP19 – Transport, Highway Safety & Urbanising Effects**

### **Relevant Objections:**

- “One way system will create traffic issues for the main road.”

- “Access off a minor side road.”
- “This will significantly cause build up and congestion to an already congested village.”
- “HGVs competing with Ice Valley lorries.”

**Policy Position:**

Development in the Green Belt must:

- Preserve openness
- Avoid introducing urbanising effects
- Not harm landscape character or highway safety

**Policy Conflict:**

One-way systems, HGV routing, congestion and access bottlenecks all represent **urbanisation of the Green Belt**, in direct conflict with LP10 and LP19.

**LP19.1.7 – Limited Infill in Villages**

**Relevant Objection:**

- “There are proposals of 110 houses.”

**Policy Position:**

Limited infill is defined as:

- Normally **no more than one or two dwellings**
- Within a continuous built frontage

**Policy Conflict:**

A proposal for **110 dwellings is not limited infill under any interpretation** and is therefore automatically contrary to LP19.1.7.

**LP6 – Safeguarded (Grey Belt) Land**

**Relevant Objection:**

- Attempted classification as “grey belt” or safeguarded land.

**Policy Position:**

- *Safeguarded land will only be released through a review of the Local Plan.*
- Permanent housing **cannot be approved outside that process.**

**Policy Conflict:**

No Local Plan review has occurred. The application therefore **cannot lawfully rely on safeguarded or grey belt status.**

**LP17 & LP6 – Infrastructure Capacity: Schools, Doctors & Transport**

**Relevant Objections:**

- Schools at or near capacity
- Doctors at capacity
- Transport impacts not addressed

**Policy Position:**

All development must demonstrate:

- Adequate school capacity
- Healthcare provision
- Traffic mitigation
- Sustainable transport delivery

**Policy Conflict:**

The proposal fails to demonstrate compliance and would result in **unsustainable infrastructure overload**, contrary to LP17 and LP6.

**SUMMARY: STRONG GREEN BELT REFUSAL GROUNDS**

This proposal conflicts with at least **ten separate Green Belt refusal principles**, including:

- Inappropriate Green Belt development
- Loss of openness
- Urban sprawl and countryside encroachment
- Loss of biodiversity
- Harm to a protected SPZ1 water source
- Harm to a major rural employer
- Traffic-related urbanisation
- Not brownfield and not limited infill
- Infrastructure and service overload
- Safeguarded land release outside a Local Plan review

**Conclusion:**

The development is fundamentally **contrary to the Kirklees Local Development Plan and the National Planning Policy Framework** and should therefore be **refused**.

## OFFICER DECISION SUMMARY – REASONS FOR REFUSAL

For the avoidance of doubt and for clarity in decision-making, the following officer-level planning grounds for refusal are respectfully identified:

- The application site is designated Green Belt land and is not allocated for housing within the adopted Kirklees Local Plan.
- The proposal constitutes **inappropriate development in the Green Belt** under LP19.1 and the National Planning Policy Framework.
- The applicant has failed to demonstrate any **very special circumstances** that would clearly outweigh the substantial and permanent harm caused to the openness and permanence of the Green Belt.
- The scale of development (approximately 110 dwellings) is not capable of being classified as **limited infill** under LP19.1.7 and therefore cannot be supported in policy terms.
- The development would result in unacceptable **encroachment into the open countryside**, causing urban sprawl and the irreversible loss of rural character.
- The proposal would lead to a **net loss of agricultural land, green space, and biodiversity**, contrary to LP62 and LP63.
- The development presents a direct risk to the operational integrity of **Shepley Spring / Ice Valley**, including its **SPZ1 protected water source**, and threatens a strategically important rural employer, contrary to LP7 and LP18.
- The proposal introduces unacceptable **highway safety risks, congestion, and traffic urbanisation** through one-way systems, access bottlenecks, HGV conflicts and construction traffic, contrary to LP10 and Green Belt policies.
- The site is not brownfield land and sits at the **lowest tier of acceptability** under the LP6 spatial strategy hierarchy for housing development.
- The proposal fails to demonstrate that there is **sufficient capacity within local schools, healthcare provision, and transport infrastructure** to sustainably support the scale of development proposed, contrary to LP6 and LP17.
- Any attempt to rely upon **safeguarded or “grey belt” status is unsound**, as LP6 is explicit that safeguarded land may only be released through a formal Local Plan review, which has not occurred.
- When assessed cumulatively, the adverse impacts of the proposal **significantly and demonstrably outweigh any claimed benefits**, and the planning balance therefore weighs decisively in favour of refusal.

Thank you for taking the time to read through my objection. I can understand that there is a lot of information to read through, I hope this has been of use to you. If you need further clarification, then please feel free to contact me.

Best Regards,