

## DC Admin

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**From:** Local Development  
**Sent:** 15 December 2025 09:03  
**To:** DC Admin  
**Subject:** FW: Formal Objection – Planning Application 2025/60/92968/E

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**From:**  
**Sent:** 13 December 2025 12:00  
**To:** Local Development <Local.Development@kirklees.gov.uk>  
**Subject:** Formal Objection – Planning Application 2025/60/92968/E

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### **Formal Objection – Planning Application 2025/60/92968/E**

I object to the above application on the grounds that it fails to comply with national and local planning policy and would result in unacceptable harm in respect of flood risk, residential amenity, landscape character, biodiversity, infrastructure capacity, and emergency service operations.

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### **Flood Risk and Policy Conflict**

The indicative layout submitted with this application places residential development wholly within Flood Zone 2, despite the remainder of the site being located in Flood Zone 1. This directly conflicts with the requirements of the National Planning Policy Framework and associated Planning Practice Guidance, which require application of the Sequential Test and the avoidance of placing the most vulnerable development in areas of higher flood risk.

The submitted Flood Risk Assessment seeks to downplay flood risk within this area. As a long-standing local resident, I can confirm that the land identified as Flood Zone 2 does flood during periods of heavy rainfall. The applicant's conclusions are therefore inconsistent with observed local conditions and cannot be relied upon as an accurate representation of flood risk.

The proposal would introduce residential development into an area known to be at risk of flooding, with inevitable consequences for future occupants and surrounding properties. This represents a fundamental policy failure that cannot be resolved through reserved matters.

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### **Unacceptable Impact on Residential Amenity**

The indicative layout would result in a dwelling positioned directly south of existing residential properties, including single-storey dwellings. Given the likely scale and massing required to address flood risk constraints, the proposal would result in an overbearing and oppressive form of development, leading to loss of light, outlook, and residential amenity.

The applicant has failed to demonstrate that these impacts would be avoided, and at outline stage there is insufficient certainty that acceptable living conditions could be achieved for either existing or future residents.

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## **Landscape, Visual Harm and Public Amenity**

The development would result in the permanent loss of one of the last remaining undeveloped and natural sections of land adjacent to the Calder & Hebble Navigation in Mirfield. This area is highly visible from the canal towpath and is widely used by residents, commuters, and visitors.

The introduction of residential development in this location would fundamentally alter the character of the canal corridor, resulting in significant and irreversible harm to the landscape, visual amenity, and public enjoyment of the area. These impacts extend well beyond the immediate site and affect the wider community.

The applicant's assertion that the harm arising from vegetation and tree loss is limited is not supported by the site context and represents a substantial understatement of the environmental impact.

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## **Biodiversity Net Gain and Riparian Corridor Deficiencies**

The submitted Biodiversity Net Gain assessment fails to demonstrate that the development would deliver a meaningful net gain in biodiversity. The proximity of residential development to the watercourse presents an inherent risk of encroachment, disturbance, and long-term degradation of the riparian corridor.

Insufficient detail has been provided to demonstrate how biodiversity harm would be avoided, managed, or offset. As submitted, the application does not meet the requirements of mandatory Biodiversity Net Gain and should not be supported.

## **Highway Impact, Congestion and Emergency Service Risk**

The applicant's own transport information confirms that the proposed development would generate **up to 26 additional vehicle movements**, all of which would be required to access and egress the site via **a single point of access onto Huddersfield Road (A644)**.

Huddersfield Road is a principal route through Mirfield and is already subject to **heavy traffic volumes on a daily basis**. Department for Transport traffic data confirms that this section of the A644 carries **several thousand vehicle movements per day**, and local experience demonstrates that traffic regularly slows to a crawl or comes to a standstill, particularly at peak times.

Introducing additional vehicle movements onto an already heavily trafficked and frequently congested road, with no alternative access route, will inevitably exacerbate congestion, queuing, and delay. This impact is not speculative; it is a foreseeable and direct consequence of concentrating all site access onto a single, overburdened highway corridor.

Of particular concern is the **proximity of the site to the local fire station**. Any increase in congestion, queuing, or obstruction on Huddersfield Road has the potential to **impede the safe and timely movement of emergency vehicles**, both during routine operations and emergency call-outs. A previous planning application in close proximity to this site explicitly acknowledged infrastructure constraints and the risk of development inhibiting fire station operations. It is therefore unacceptable that similar risks are not robustly and transparently addressed in this application.

The failure to demonstrate that additional traffic would not compromise highway safety or emergency service response times represents a serious deficiency. Impacts on emergency access are a material planning consideration and raise clear public safety concerns that cannot be dismissed or deferred.

Taken together, the reliance on a single access point, the acknowledged increase in vehicle movements, the known congestion on Huddersfield Road, and the proximity of the fire station demonstrate that the proposal would place additional and unacceptable strain on local infrastructure. As submitted, the application fails to show that the development can be accommodated safely or without detriment to the efficient operation of the highway network and emergency services.

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## **Conclusion**

The application is fundamentally flawed in principle. It conflicts with national and local planning policy, relies on assessments that do not reflect known local conditions, and would result in significant and irreversible harm to flood safety, residential amenity, landscape character, biodiversity, infrastructure capacity, and emergency service operations.

For these reasons, the application should be refused.