

**Sent:** 04 January 2026 19:41  
**To:** DC Admin  
**Subject:** Planning Application Number 2025/93387

### Objection to Planning Application Number 2025/93387

I wish to strongly object to the above planning application for the erection of a poultry unit at Bolster Moor Farm, 33 Bolster Moor Road, Bolster Moor.

This is the second time the applicants have attempted to obtain planning permission for a large poultry unit in Bolster Moor. KC Environmental Health (Pollution & Noise Control) was unable to support the previous application citing the close proximity to neighbours and loss of amenity.

Changing the location of the poultry unit from that first proposal does not mitigate any concerns from local residents regarding pollutants, odour, dust and loss of amenity generated by such a building.

It is quite evident to anyone that the proposed poultry business will not stop at one poultry hut. You just have to look at how the farm shop and café have repeatedly expanded, both with and without the required planning permission, to realise that the same will happen with this new venture.

### Inaccuracies/Contradictions in the Planning Application and Supporting Statement

As with the applicant's previous planning application, there are numerous inaccuracies and contradictions contained within this one.

1. The Application states that the site is not currently vacant. The proposed site of the poultry unit **is** currently vacant – it is undeveloped pastureland in a designated Green Belt area.
2. The Application states that the proposed unit will not be near a watercourse. This is not true. As pointed out in objections to the initial application, a land drain runs a few meters away (downhill) from this proposal – possibly even underneath the proposed site for the building. Both applicants are well aware of the existence and location of this watercourse.
3. The Application states that no hazardous materials will be used. This is incorrect as the Statement notes that flies will be kept under control with pest control tapes treated with **insecticide**. Insecticide is a hazardous material.
4. Point 4.0 of the Statement claims there is “zero infrastructure requirement”. This is not true. The definition of an “infrastructure requirement” is “the basic organisational and physical structure

that is required to run a business smoothly”. The application is for the building of a **physical structure** in the form of a large poultry shed.

5. The Application states that it does not involve the carrying out of commercial activities, yet the Statement clearly states the opposite in point 4.1 “...for the farm shop to meet egg demand” – clearly a commercial activity.
6. Point 6.2 of the Statement states the nearest residential properties to the northeast and southeast do not have windows facing on to the site. This is incorrect as these properties **do** have windows facing on to the site meaning the poultry unit will be in clear view of them. This would have been very evident on a “site visit”.
7. Point 6.2 goes on to state that the nearest property is 100m away. This is incorrect – the nearest residential property is 90m away in the direction of the prevailing wind.
8. The Application states that new or altered vehicular and/or pedestrian access to or from the public highway is not proposed. This is incorrect – 7.2 Access to the Development in the Statement clearly states that “crushed limestone will be laid in the gateway, after removing three inches of topsoil” – thereby altering access to the proposed site.
9. Point 8.3 of the Statement says there will be a “natural ventilation gap all along the length of the ridge” and “a 150mm gap between the two sheets at the apex where they meet” yet in point 9.5 it describes the shed as a “closed building”. Point 10.4 states that “ventilation will be provided naturally” – again contradicting the description of a “closed building”. Any gaps in the building will mean that dust and odour will be emitted from it blowing into the surrounding area. It also means flies will be able to enter and exit the building.
10. None of the photographs included in the Statement have been taken from the farmyard. The farmyard is 90m away from the proposed site. The photos seem to be leading you to think that this proposed new building is very close to current buildings within Bolster Moor Farm – it isn’t. The closest building to this proposed poultry shed is approximately 60m away.
11. The Habitat Plan is dated 3 May 2024 and relates to a totally different field.

#### The 400m Rule, Sensitive Receptors and Pollution

The proposed poultry building will be far too close to residential properties. A 400m rule exists with regards to new livestock buildings, therefore anyone living within 400m of a livestock building must be extremely susceptible to the pollutants emitted from the livestock building, otherwise this 400m rule would not exist.

There are numerous residential properties within 400m of this proposed development, including a school, nursery, a bus stop and a number of heritage properties, all of which will be adversely affected by the odour and dust created by this poultry shed due to the normal direction of the wind in Bolster Moor. Individuals living in nearby properties are defined by the Environment Agency (“EA”) as “sensitive receptors”. A document published by the EA regarding dust control measures in poultry farms states that if “the sensitive receptor is downwind of the poultry sheds then it is likely to experience a greater frequency of higher particulate concentrations than if the sensitive receptor was the same distance away but upwind of them.” Studies show a significant increase in risk to health from living too close to poultry units.

The evidence that components of poultry dust are a respiratory hazard and are harmful to health is so strong that poultry dust is listed in Control of Substances Hazardous to Health (COSHH) regulations. Chicken excrement derived ammonia is a key air pollutant combining with other pollutants creating “particulate matter” and is linked to higher death rates, respiratory problems and cardiovascular diseases. The Code of Good Agricultural Practice (COGAP) for Reducing Ammonia Emissions produced by DEFRA in January 2024, states “where possible, ammonia sources should be positioned as far as possible from sensitive receptors like people and protected habitats.” These noxious odours will get worse and worse during each production cycle as the Application states the shed will only be cleaned out at the end of each production cycle (approximately every 18 months). The same can be said for the particulate pollution that will get worse and

worse over the same cycle. Dust is bound to be produced at the end of each cycle when the unit is cleared out.

Drummer Lane is a popular route for walkers – they would breath in this particulate matter whilst walking in proximity to the proposed building. Children from the local school are often seen at the junction of Drummer Lane and Bolster Moor Road learning cycling proficiency. They would be in the direct line for breathing in these pollutants.

The Statement states that “a handheld ammonia sensor will be used to detect changes in ammonia levels”. Who will conduct these tests, how often and will records of these readings be available to interested parties? If the applicant will be doing these tests, how do residents know that he will conduct these tests correctly? What will happen when these ammonia levels breach the legal limit? The proposal makes no mention of how these concerns will be met.

Policies LP51 and LP52 of the Kirklees Local Plan discuss potential pollution from new developments, with Policy LP52 stating that “where possible, all new development should improve the existing environment”. Paragraph 18.4 of the Kirklees Local Plan states that “long term exposure to air pollution can lead to more serious symptoms and conditions affecting human health”. It is quite obvious that this “new development” will **not** improve the existing environment and has the potential for deleterious effects on the health of local residents.

### Watercourses

Bolster Moor is in an area of high risk to groundwater contamination (Ref: DEFRA “MAGIC” map). On the application form the applicant has stated the proposal will not be within 20m of a watercourse. This is incorrect. The proposed poultry shed will be extremely close, if not directly on top of, an existing land drain. Both applicants are well aware of this watercourse as their livestock use it as drinking water where it comes to the surface on their farmland.

This land drain runs the length of Bolster Moor, through Headwall Green, down to Dyke End where it splits in two and provides drinking water to animals on farmland and then continues to drain down into Colne Valley and ultimately the River Colne.

There is no mention of the construction of this building’s floor; poultry sheds do not tend to have an artificial floor – instead sheds usually sit directly on the soil meaning that pollutants from the chicken excrement will constantly leach into the soil and therefore into the groundwater and land drain, particularly during deep cleaning at the end of a production cycle when any pollutants will be jet washed into the ground. This land drain already struggles to contain water during periods of heavy rainfall, causing localised flooding. Any pollutants entering this watercourse will have an adverse effect on numerous wildlife, and will obviously affect the quality of the drinking water for animals on farmland.

### Noise

Point 9.4 in the Statement says that hens, especially when kept completely indoors in a closed building, are generally quiet, making low-level noise. I disagree with this. The 1,500 hens will generate constant noise – clucking, scratching, squawking when egg laying. Crowing is not limited to roosters; hens also crow. Even though the Statement claims no roosters will be kept on site, it is well known that the presence of males in

a layer breeder stock helps to reduce stress and fear responses in the hens, so how long will it be before the applicant introduces roosters?

There is no mention of machinery in the Application – how is the unit going to be serviced (egg collection, cleaning and packing, feed deliveries, trade waste removal, mucking out, etc) if not with mechanical methods. Any noise will be a large intrusion into the lives of local residents who have the right to the peaceful enjoyment of their property. Additional traffic through the village will also have an impact on noise levels. KC Environmental Health (Pollution & Noise Control) had concerns regarding noise generated by such a large number of hens in their response to the applicant’s previous planning application for a unit housing 1,500 hens.

### Biosecurity

As detailed in the DEFRA Code of Practice for the Welfare of Laying Hens and Pullets, the biosecurity measures for anyone keeping captive birds appear to be quite onerous, yet there is no mention of any biosecurity measures in the Application. The applicant already keeps racing pigeons in a pigeon loft (less than 90m away) as well as a number of free range poultry in a hut close to the proposed site. There must be a high risk of disease transmission here. We live in a time of accelerating crossovers of viruses between animals and humans – as evidenced by the Covid pandemic.

The Application does not show a double door entry system with a separate chamber to isolate the poultry from the outside world. Where will the applicant place the foot dip and his items of clothing to wear when dealing with the poultry? How will the applicant prevent 1,500 hens from escaping from the unit whenever the two 6’ wide and 10’ high steel doors are opened? There are no details in the Application concerning these points. The Application is for barn hens, which by definition are kept inside. Again, the proposal makes no mention of any of these protocols required to meet basic hygiene regulations.

Over the production cycle of the hens, there are bound to be deaths. There is no mention of how dead birds will be disposed of. The Application makes no mention of the quarantining of replacement birds and no mention of where this would happen. The plan shows a single space shed. The applicant has been seen, on a number of occasions, disposing of his dead pigeons in the corner of a neighbouring field. Will this be the resting place of any dead hens? Again, the proposal makes no mention of how dead birds are to be disposed of.

The proposal omits any mention of how any of these obvious biosecurity hazards will be handled. Surely, before any decision is made, these important points should be addressed in writing so that the Council can ensure that the on-going operation of this poultry shed does not become a biohazard for local residents.

### Waste Products

Waste materials such as poultry litter and manure can pose a serious threat to environmental and human health, and need to be managed properly. The Application states there are no identified areas to store and aid the collection of waste, nor does it explain how trade waste will be disposed of. One of the applicants has a long-standing history of burning all manner of inappropriate trade waste generated by his current

handyman business, as well as waste generated by his current poultry flock, causing distress to many village residents – is this how he plans to dispose of waste generated by this new venture?

I am sure the applicant will regularly clean out the feeding troughs – where is he planning to put any uneaten, compacted, rotten or rotting feed.

The Application makes no mention of how spent hens will be dealt with at the end of the production cycle. Will they be slaughtered on site – not a very pleasant prospect for anyone living nearby. Is the applicant planning to sell these spent hens through the farm shop, in ready meals for instance?

There is no manure management plan in the Application. The UN Food and Agriculture Organisation advise the moisture content of chicken manure has to be reduced to the correct levels prior to spreading on land. The Application makes no mention of how this will be achieved or where this drying manure will be stored. Chicken manure dust and gases, including corrosive ammonia, emanating from any manure heap would be an obvious health risk to those living nearby. The current mis-management of the applicant's manure heap already causes effluent run-off into his neighbours' properties.

#### Is the Building Genuinely Required for the Purposes of Agriculture?

Paragraph 19.10 of the Kirklees Local Plan states that new agricultural buildings must be "...genuinely required in connection with an agricultural [...] enterprise and that the need can be demonstrated." The applicant wants a poultry shed in order to supply the family's farm shop with eggs, yet the farm shop is already supplied with eggs from other suppliers, therefore I do not believe that this new building is a genuine requirement.

Paragraph 19.12 of the Kirklees Local Plan states "wherever possible and in accordance with core planning principles the reuse of existing buildings will be preferable to the erection of new ones." The applicant has access to empty poultry sheds owned by the family - surely a better plan would be to reuse one of these poultry houses?

#### Impact on Highway Safety

Point 7.4 of the Statement says the proposal will create one daily vehicle movement. Surely this is incorrect. The poultry will require approximately 1.1 tonnes of feed per week (Ref: BHWT), which will generate additional traffic through Bolster Moor. The entrance to the proposed site, detailed on the Application, is a narrow farm gate into a field on a narrow rural lane that does not contain pavements. Residents, including children from the local Children's Nursery, and other members of the public regularly walk along this road due to the lack of traffic. I believe there would be an unacceptable impact on highway safety due to the increase in goods vehicles deliveries and collections at this location. The huge increase in traffic in recent years on the local road network would be further exacerbated by these regular deliveries and collections. Regular deliveries and collections will require vehicles turning into and out of Bolster Moor Road at the junction of Drummer Lane. This junction has restricted sight lines.

#### Access to the Development

The Application states that new or altered vehicular and/or pedestrian access to or from the public highway is not proposed, yet the Statement contradicts this in point 7.2 stating that crushed limestone will be laid in the gateway, after removing three inches of topsoil, to prevent the entrance becoming muddy in winter. It goes on to state that this crushed stone will bed into the ground once it is well rolled in. Whilst this bedding in takes effect loose stone will end up being dragged out on to the highway by, amongst others, the regular feed deliveries required by the keeping of 1,500 hens – who is going to ensure any loose stones are cleared away?

### Storage

There is nothing in the Application about the storage of dead birds awaiting disposal, bird feed, bedding, poultry maintenance products, cleaning products, eggs, egg packaging, trade waste, etc. A manure management plan is not included. I am sure the applicant will claim these materials will be stored elsewhere but this would prove onerous and, very quickly, they would be stored outside the poultry shed causing an eyesore and attracting vermin.

### Summary

The application site is within designated Green Belt where, as set out in the National Planning Policy Framework (NPPF), the construction of new buildings, subject to certain exceptions, are regarded as inappropriate development. The building of this poultry shed would harm the openness of the Green Belt as it would introduce a new building into an open field creating an encroachment into the countryside – constituting inappropriate development in the Green Belt which is, by definition, harmful to the Green Belt. As stated earlier, the nearest building to this proposed site is approximately 60m away.

KC Environmental Health (Pollution & Noise Control) made the following Consultation Response relating to the applicant's previous planning application for a poultry unit:

“The building proposed is situated circa 30m from the nearest sensitive receptors, we have concerns that noise, odours, dust and flies from the housing of such a large number of hens and the spreading of waste (sawdust and animal waste to land) can cause loss of amenity. We are therefore unable to support this application due to the proximity to nearby residents and the potential for loss of amenity.”

Just because this new planning application proposes to site the building in a different location (90m from the nearest sensitive receptor) the 400m rule regarding the siting of new agricultural buildings still exists. I do not see how any of the Environmental Health concerns have been mitigated with this new application.

The Kirklees Local Plan, paragraph 19.7, states “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 so caused.” It is clear that there are no special circumstances that exist which would outweigh the harm caused by this poultry unit. The proposed development would be contrary to the aims of Chapter 13 of the NPPF.

Policy LP54 of the Kirklees Local Plan states that “proposals for new buildings for agriculture and forestry will normally be acceptable, provided that there will be no detriment to the amenity of nearby residents by reason of noise or odour or any other reason.” In planning terms, residential amenity refers to the quality of living conditions that contribute to a dwelling's pleasantness and usability, which new developments must not unreasonably spoil for existing residents.

It is quite obvious that granting permission for this agricultural building in Bolster Moor will lead to a loss of residential amenity for existing residents and the application should therefore be refused. It is also difficult to see how an application that contains such a large number of errors, omissions and contradictions, whether intentional, accidental or both, could possibly be approved.