

## About the application

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| Application number: 2025/91236   |                                                                            |
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| What is the application for?:    | Outline application for erection of residential development (one dwelling) |
| Address of the site or building: | Land off, Stocks Moor Road, Stocks Moor, Huddersfield, HD4 6XQ             |
| Postcode:                        |                                                                            |

## User comments

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| Type of comment: An objection                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |     |
| Do you wish your comments to be published on the website anonymously?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Yes |
| <p>The site is an open green field, used for grazing, consistent with other fields that surround it on all four sides.</p> <p>Historic maps show the site has not been previously developed, and it should therefore be considered greenfield. The tree immediately adjacent to the site is subject to a Tree Preservation Order (27/93/T5). The site is adjacent to a public footpath (KIR/119/30) and is within the Green Belt as designated by the Kirklees Local Plan. The proposed access is an adaptation of an access granted in response to a planning application 2019/62/90847/E by a company called K Hall Builders Limited (which was then certified as the owner) for a "field access" for land used for grazing. Comments by residents at the time expressed concern that this may be a precursor to development.</p> <p>As the site is separated by fields and a road from any buildings it is better described as isolated rather than "adjacent to an existing large built form" as the application contends.</p> <p>The application appears to be substantially based on an analysis that the site is "grey belt".</p> <p>The PPG last updated on 27 February 2025 gives specific guidance as to how authorities should assess their Green Belt to identify grey belt land when considering an update to a local plan, or a planning application.</p> <p>"In order to identify grey belt land, authorities should produce a Green Belt assessment, either as part of the review of Green Belt boundaries during the preparation or updating of a local plan, or at another relevant point."</p> <p>It is later clarified that:</p> <p>"In assessing their Green Belt, it will in most cases be necessary for authorities to divide their Green Belt into separate assessment areas for the purpose of identifying grey belt. The number and size of assessment areas can be defined at a local level</p> |     |

grey belt. The number and size of assessment areas can be defined at a local level and respond to local circumstances. However, the following principles will need to be considered:

- i) when identifying assessment areas, authorities should consider all Green Belt within their Plan areas in the first instance
- ii) to ensure any assessment of how land performs against the Green Belt purposes is robust, assessment areas should be sufficiently granular to enable the assessment of their variable contribution to Green Belt purposes”

It is clear that assessment of grey belt land should not be carried out in isolation, looking solely at this site.

Paragraph 148 of the December 2024 National Planning Policy Framework (NPPF) to which the applicant refers, also makes clear that

“Where it is necessary to release Green Belt land for development, plans should give priority to previously developed land...”

There are many brownfield sites in Kirklees that would make a more substantial contribution to increasing the housing supply - especially of affordable housing - than a single large house, which is immaterial in this context. In any event, an assessment should first be carried out of all the Green Belt in Kirklees.

Is the site grey belt? In order to be treated as grey belt, land must not “strongly contribute” to any of the specified Green Belt purposes.

The concept of “not strongly contributing” requires a comparison between the contribution of open green fields (such as the site) with the contribution of other parts of the Green Belt.

A brownfield site might not contribute strongly to Green Belt purposes. A field that is hemmed in with infrastructure and pre-existing housing might not contribute as strongly as an open field. This site is simply an open green field outside the existing confines of the village. There is no basis upon which it can be said to contribute less strongly than any of the other open fields that make up the Green Belt.

If permission were granted here, there would be no basis to deny permission for development in any number of green fields across Kirklees. There would be an uncoordinated race to make applications before a holistic plan can be made.

The PPG also makes clear that even if the site is technically grey belt (which is disputed) “it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. The contribution Green Belt land makes to Green Belt purposes is one consideration in making decisions about Green Belt land.”

The application does not address Green Belt policies in the Kirklees local plan. Paragraph 19.1 of the Local Plan makes clear that Green Belt has a particular importance within Kirklees. It states:

"The Green Belt and network of open spaces within and around the towns and villages of Kirklees make a significant contribution to the character and attractiveness of the district and people's quality of life."

That is particularly true of Stocksmoor, where the open views and network of footpaths contribute substantially to the quality of life for both residents and those who visit for recreation. Allowing fields to be developed ad hoc would run against this policy consideration and Kirklees' general policy towards Green Belt.

As regards sustainability, the village has no shop and visits to local amenities such as the doctors' surgery or pharmacy typically require a journey in a car.

There are inaccuracies in the application. The applicant's name is "Marcus Hall" of a company named "Construction Industry". It is certified that this company owns the site. I understand that Marcus Hall (Properties) Limited is the true owner of the site.

The location of the site has been mis-stated as Stocks Moor. The correct address is at Stocksmoor. This has meant that the application has only very recently come to the attention of local residents. Searches of "Stocksmoor" do not bring up the application.