

Address: 32, Cumberworth Lane, Huddersfield, hd8 8pa

About the application

Application number: 2025/93572	
What is the application for?:	Outline application with all matters reserved, bar vehicle access into the site,
Address of the site or building:	Land South of, Barnsley Road, Upper Cumberworth, Huddersfield, HD8 8NN
Postcode:	

User comments

Type of comment: An objection	
Do you wish your comments to be published on the website anonymously?	No
<p>I write to formally object to the above planning application. This objection is based on material planning considerations, supported by relevant evidence, national policy and published statistics.</p> <p>1. Conflict with the Development Plan and Plan-Led System</p> <p>Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires decisions to be made in accordance with the adopted development plan unless material considerations indicate otherwise.</p> <p>The Kirklees Local Plan is the adopted development plan and establishes a clear spatial strategy, directing growth to sustainable locations, allocated sites, and previously developed land. The application site is not allocated for development through the Local Plan process and therefore represents speculative development that undermines plan-led decision-making.</p> <p>The National Planning Policy Framework (NPPF) is explicit that the planning system should be genuinely plan-led and provide certainty for communities (NPPF paragraphs 15–20).</p> <p>2. Housing Land Supply – Context, Not Justification</p> <p>Kirklees Council has publicly acknowledged that it does not currently demonstrate a full five-year housing land supply.</p> <ul style="list-style-type: none">- The Council's most recent monitoring confirms a housing land supply of less than five years, triggering application of the NPPF "tilted balance".- Kirklees has also failed the Government's Housing Delivery Test, delivering below 75% of its required housing target in recent years, as published by the Department for Levelling Up, Housing and Communities (DLUHC).	

As a result, national policy requires a 20% buffer to be applied to housing land supply calculations (NPPF paragraph 77).

However, the NPPF is clear that a housing shortfall does not override all other policies. Paragraph 11(d) still requires that development is sustainable and that adverse impacts do not significantly and demonstrably outweigh the benefits.

The existence of a housing shortfall is not a blanket justification for releasing unallocated or poorly located sites.

3. Unsustainable Location – Evidence of Car Dependency

The NPPF places strong emphasis on reducing reliance on private car travel and prioritising sustainable transport modes (NPPF paragraphs 104–113).

According to ONS Census and Department for Transport data:

- In semi-rural and edge-of-settlement areas of Kirklees and wider West Yorkshire, over 75–80% of journeys to work are made by private car or van.
- Public transport usage in such locations is significantly lower than urban averages, particularly outside peak hours.

This proposal would reinforce car dependency rather than reduce it, contrary to national policy objectives on climate change, sustainability and transport hierarchy.

4. Harm to Character, Landscape and Settlement Pattern

The NPPF requires that development responds positively to local character and avoids unnecessary sprawl into open or countryside areas (NPPF paragraphs 130 and 174).

Incremental expansion beyond established settlement boundaries leads to:

- Erosion of local character and identity
- Loss of openness and landscape value
- A precedent for further encroachment

Such harm is long-term and irreversible and must be given substantial weight in the planning balance.

5. Highway Safety and Network Capacity

Paragraph 111 of the NPPF states that development should only be prevented on highway grounds where impacts would be unacceptable or severe.

Even modest residential schemes typically generate:

- 6–8 vehicle movements per dwelling per day (DfT TRICS data)
- Increased peak-time pressure on local junctions and access roads

Without clear, independently verifiable evidence that local roads, junctions and pedestrian routes can safely accommodate additional traffic, the proposal fails to meet national policy tests.

6. Pressure on Infrastructure and Services

New residential development must be supported by adequate infrastructure (NPPF paragraphs 92–95).

Kirklees Council's own evidence base recognises pressure on:

- School capacity in several wards
- Primary healthcare provision
- Local highway and drainage infrastructure

In the absence of clearly defined and secured Section 106 obligations addressing these impacts, the proposal is premature and unsound.

7. Ecology, Trees and Biodiversity Net Gain

The Environment Act 2021 and NPPF paragraph 180 require development to deliver measurable biodiversity net gain.

Where development affects greenfield land, hedgerows or mature trees:

- Ecological harm is likely to be greater
- Mitigation must be robust, enforceable and secured for the long term

Without absolute clarity on biodiversity net gain delivery and management, the proposal fails to comply with national policy.

8. Flood Risk and Climate Resilience

National policy requires development to be directed away from areas at risk of flooding and to demonstrate climate resilience (NPPF paragraphs 159–170).

West Yorkshire has experienced a documented increase in surface water flooding events, and any proposal must conclusively demonstrate that it will not:

- Increase flood risk on or off site
- Overload existing drainage infrastructure

Any uncertainty in this regard must weigh against approval.

9. Planning Balance

Even applying the tilted balance, the NPPF requires refusal where the adverse impacts of granting permission significantly and demonstrably outweigh the benefits.

In this case, the harms include:

- Conflict with the Local Plan
- Unsustainable location and transport patterns
- Harm to character and landscape
- Infrastructure and highway concerns

These harms outweigh the limited benefits of an unallocated housing proposal.

Should officers be minded to recommend approval, I request that this application be determined by Planning Committee to allow full and transparent public scrutiny.