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?	Yes

I strongly oppose the proposal to develop on this productive arable field adjacent to highly important Ancient Woodland.

The position of this field from The Dearne Way in what is one of the most picturesque areas of Kirklees is known to so many people. Please look up The Dearne Way online and you appreciate how popular a walking route this is. Once the salt road and main route from Manchester to Wakefield and beyond (long before Barnsley Road was constructed) the views towards St Nicholas Church spire has been a key nodal point and way marker for decades. As you emerge or enter Stephen Woods, rich in flora and fauna it is instinctive to glance uphill to village vista.
The setting would be ruined if the development was allowed to go ahead with high garden fences blotting the landscape and new builds towering above any nearby properties which are predominantly bungalows with sympathetic planting to blend in to the green space.

It is abhorrent that the developer suggests a 15m buffer to the ancient woodland would protect it from any harm. The introduction of cats alone, which have been proven to cause ecological destruction beyond 400m would be devastating to the wildlife populations.

Below is an extract from a recent Forestry Commission consultation response for a similar proposal:

Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS).

Paragraph 193 (c) of the National Planning Policy Framework (Dec 2024), states: “Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation

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It goes on to include what could be considered as “wholly exceptional reasons” and states:
“For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.“ (not applicable in this case)

As Ancient woodland, ancient trees and veteran trees are irreplaceable, proposed compensation measures should not be considered as part of your assessment of the merits of a development site proposal.

We also particularly refer you to further technical information set out in Natural England and Forestry Commission’s Standing Advice on Ancient Woodland – plus supporting Assessment Guide and “Keepers of Time” – Ancient and Native Woodland and Trees Policy in England.
The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you’re likely to need a larger buffer zone.

The Standing Advice and the recommended buffer zones are currently under review and are
likely to be updated recommending that the minimum buffer requirement will be increased. While a 15m buffer may be appropriate for a single dwelling, for large scale developments, we would recommend this is increased to 30-50m depending on circumstances. Development that encloses a woodland and removes functional habitat links should be avoided.

The Joint NE/FC Standing Advice also states that both the direct and indirect effects of development should be considered for both the construction and operational phases of any proposed development. Not just including the potential for actual construction to impact on soils, trees and tree
roots. But also the potential for effects when residential developments are in use and result in a likely increase in visitor numbers.

Other impacts to the ancient woodland, for example reducing the resilience of the woodland and making it more vulnerable to change. Increasing the amount of dust, light, air and soil pollution and increasing disturbance to wildlife, also trampling of plants, erosion of soil and noise from additional people, traffic and domestic pets. Due to the irreplaceable nature of ancient woodland, most temporary effects will result in irreplaceable damage.

It is also worth noting that the Town and Country Planning (Consultation) (England) Direction 2024 mandates that Local Planning Authorities notify the Secretary of State if they are minded to approve any planning applications that could lead to the loss or deterioration of ancient woodland.

As you will see there are no exceptional circumstances and the buffer zone will be required to be much larger to even start to compensate for such ecological destruction.

The widely available matrix the Determination of Buffer Zones to Protect Ancient Woodland, SSSIs, and Protected Habitats from Harm due to Development has clearly not been consulted.

Calculating the exact width of a buffer zone is less about a single "plug-and-play" equation and more about a Risk-Based Assessment (specifically an Ecological Impact Assessment or EcIA).

While Natural England provides a 15m "floor," this is almost exclusively to protect the Root Protection Area (RPA). The Woodland Trust's 50–100m recommendation is based on mitigating "edge effects"—the chemical, biological, and physical changes that occur when a forest edge is exposed to development.

To establish the exact dimension for a specific site, ecologists use a Source-Pathway-Receptor methodology, the appointed ecologist should be familiar with this process but it appears not.

They have also ignored obvious protected species which thrive very locally to the field, using it for foraging, but I am confident the council ecologist will pick up on this.