



I strongly object to this application on the basis of Green Belt harm, insufficient protection of priority woodland, loss of high value agricultural land, ecological impact, unsustainable location, and highway safety concerns.

The site lies within the Green Belt - new housing is considered inappropriate development unless very special circumstances exist, which this application does not justify. The Kirklees Local Plan places strong emphasis on protecting the openness and character of the countryside and ensuring development occurs in sustainable locations with adequate facilities and infrastructure. This proposal fails to meet these policy requirements, conflicting with Local Plan policies LP1, LP2 and LP3 which require development to be sustainable, appropriately located, and reflective of settlement size and function.

The development also sits immediately adjacent to a priority woodland habitat and the River Dearne wildlife corridor. The council's own ecological consultee states clearly that the proposed 15m buffer is the absolute minimum, and that because this is a major development, a 30-50m buffer is required. As currently designed, the development risks degrading an irreplaceable habitat used by bats, hedgehogs, nesting birds and reptiles, with the woodland edges forming key commuting and foraging routes. Approving the scheme without resolving these discrepancies would be premature and contrary to Local Plan policy LP30, which requires robust biodiversity protection.

The land itself consists of grassland, cereal crops, mature trees and hedgerows, representing high quality agricultural land and providing important wildlife habitat. Development would result in permanent loss of both food producing land and ecological value.

Upper Cumberworth is a small rural settlement with limited services, minimal employment opportunities, and poor access to sustainable transport. Active Travel England guidance requires key amenities to be within 800m walking distance (including health services), supported by safe, direct, accessible routes. The village does not meet these standards. Future residents would be heavily car dependent, directly contradicting national and local policy objectives to promote active travel and reduce reliance on private vehicles.

Highway safety is a further major concern. Barnsley Road is widely known as a collision hotspot, and adding traffic from 123 dwellings will significantly increase risk to pedestrians, cyclists, and existing road users. Active Travel England emphasises that new development must not create unsafe conditions and must include safe crossings, low speed design and high quality pedestrian and cycling infrastructure - none of which are adequately demonstrated in this proposal.

In summary, the proposal conflicts with fundamental Local Plan and national planning policies relating to the Green Belt, biodiversity, sustainability and highway safety. The environmental harms, unresolved ecological issues, and lack of infrastructure and accessibility significantly and demonstrably outweigh any potential benefits. I therefore request that this application be refused in full.