

# Statement of Objection

13<sup>th</sup> February 2026

Application number 2025/60/93572/E

Outline application with all matters reserved, bar vehicle access into the site, for erection of up to 123 dwellings with associated works including open space, landscaping, drainage infrastructure.

For the attention of Ellie Thornhill, Kirklees Council

Having reviewed the application and supporting documents, there is no doubt that this speculative proposal is entirely inappropriate and should be refused.

The supporting documents are largely unrepresentative, there are regular replication errors, the topography of the site has been misrepresented, and it appears much of the information must have been produced without site visits or reference to the provided proposed site layout.

I have listed my personal objections below stating policy where appropriate.

- **Policy LP1 – the proposal does not constitute sustainable development therefore does not comply**

*The government's view is that the purpose of planning is to help achieve sustainable development. In this context 'sustainable' means ensuring that the lives for ourselves doesn't mean worse lives for future generations.*

The proposed site is located within the rural village of Upper Cumberworth, the rural setting is adored by both locals and visitors. From the glance view towards the foothills of the Penines enjoyed by motorists travelling along Barnsley Road to the historic village vista framing the Church Spire experienced by the many walkers along the popular Dearne Way since the times of the Salt Road. The proposals would damage the long-established character of the village for future generations.

The proposals would have a severe impact on the adjacent Ancient Woodland, many habitats would be affected resulting in wildlife disappearing from what is currently a thriving location, the loss would be irreversible and felt greatly by current and future generations.

*National planning policy states the dimensions that must be considered for sustainable development, one being an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and, as part of this helping to improve biodiversity, use natural resources prudently minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.*

The proposal fails to meet any of these obligations. From the obvious and vast ecological damage which would result from this development to the less obvious constant energy use of the proposed pumping station to replace an existing gravity combined sewer. The increased pollution risk when there is a power outage or pump issue alone would be devastating to the adjacent woodland and high sensitivity watercourse.

The village is remote from amenities and shops, with a limited bus service and unviable lengthy and dangerous walk to Denby Dale to access an infrequent train service. Potential residents would be reliant on car journeys alone. To suggest future residents would risk their safety to walk to

Denby Dale to then take a once an hour train to a stop anywhere near a supermarket and then retrace their steps carrying heavy bags is entirely implausible.

As stated in the local plan due to limited opportunities for people to work and shop locally more people in this part of Kirklees commute longer distances.

- **Policy LP2 - the proposal does not protect or enhance the character of the area therefore does not comply**

There has been no effort to protect and improve green infrastructure. The plans would severely impact the existing green infrastructure which is so highly regarded in this area.

As stated in the local plan *development should be promoted in locations and ways to reduce greenhouse gas emissions and avoiding the loss of agricultural land.*

Dry stone walls so characteristic of the area and providing a key ecological role are proposed to be removed or are at risk of degradation.

- **Policy LP3 – the proposals do not reflect the Spatial Development Strategy therefore does not comply**

The development would not reflect the settlements size and function and place shaping strengths opportunities and challenges neither does it support the delivery of housing in a sustainable way.

*The NPPF states that the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy, telecommunications, utilities, waste, health, social care, education flood risk and coastal change should be assessed to test the ability to meet forecast demands.*

The proposal is speculative and outside of the local plan. In the existing infrastructure could not cope with such a large development.

- **Policy LP4 - existing infrastructure is at capacity therefore does not comply**

The proposal is for the development of 123 dwellings within a village of only 390 properties. The current infrastructure cannot cope at present and most certainly could not accommodate such a large uplift in numbers.

The existing combined sewer system is already exceeding capacity, the combined system surcharges resulting in contaminated flows into woodland upstream. The proposed drainage scheme is severely flawed and would result in increased flood and pollution risk. Contrary to the drainage information submitted the combined system which the developer proposes to reroute serves the whole of Birdsedge and parts of High Flatts not just the houses on Park Lane.

Yorkshire Water has previously confirmed that there is no additional capacity for this development and that they will be objecting to these proposals.

Many properties struggle with water pressure at present and the aging water delivery pipes are often being repaired resulting in frequent road closures.

Many people also find it difficult to get doctors dentists and other appointments and none of these services are available within walking distance.

- **Policy LP5 - this application attempts to bypass the master planning stage, does not consider key design issues and therefore does not comply**

Initially consultation consisted of a meeting whereby only six members of the village community were invited. The publicised consultation via leaflet was not delivered, ended early and we were unable to submit our comments.

*The design does not respect the character of the landscape, heritage, adjacent and nearby settlements and built development reflecting the urban to rural transition with appropriate boundary treatment.*

*Nor does it Make a positive contribution to local character and distinctiveness, reduce the need for car use and encourage sustainable modes of travel, or demonstrate a good understanding and respect for the natural environment its heritage assets and their setting both within the site and in the wider locality, where the designated or not.*

The landscape visual impact assessment makes frequent reference to mitigation measures, yet it is unclear what this refers to when looking at the plans. The report also underestimates the sensitivity of the viewpoints throughout, is not a true reflection of the importance of the functionality of the land and surroundings and does not reflect the widespread importance of the landscape and the major walking routes.

The Dearne Way is the busiest part of the village, and a favourite for out of area walkers, yet little consideration has been afforded to this village hub.

Heritage assets such as the medieval watermill and original village water supply in Stephen Woods, have gone unmentioned.

In terms of the proposed transition into green belt, there doesn't appear to be one. The plans indicate gardens to back straight on to agricultural land, this is not acceptable. It is of utmost importance to protect the green belt character if the surroundings, ensure the function of this land would not be impeded and to ensure the safety of the animals which graze.

Many garden plants are poisonous to farm animals and there is an invasive species risk.

A sufficient and secure green belt buffer must be identified along all boundaries adjoining the green belt for any proposal affecting neighbouring green belt land.

- **Policy LP7 – the proposal does not make efficient and effective use of land and buildings and therefore does not comply**

*As stated in the Local Plan Proposals should encourage the efficient use of previously developed land in sustainable locations provided it is not of high environmental value. Should encourage the reuse or adaptation of vacant or underused properties. And should give priority to despoiled, degraded, derelict and contaminated land.*

This development would result in the loss unspoilt productive agricultural land which provides food in a world where food security is so important. It also provides vast environmental and amenity benefits along with maintaining the openness of the village and the key viewpoints.

- **Policy LP20 – the proposal is not located in accordance with the special development strategy and therefore does not comply**

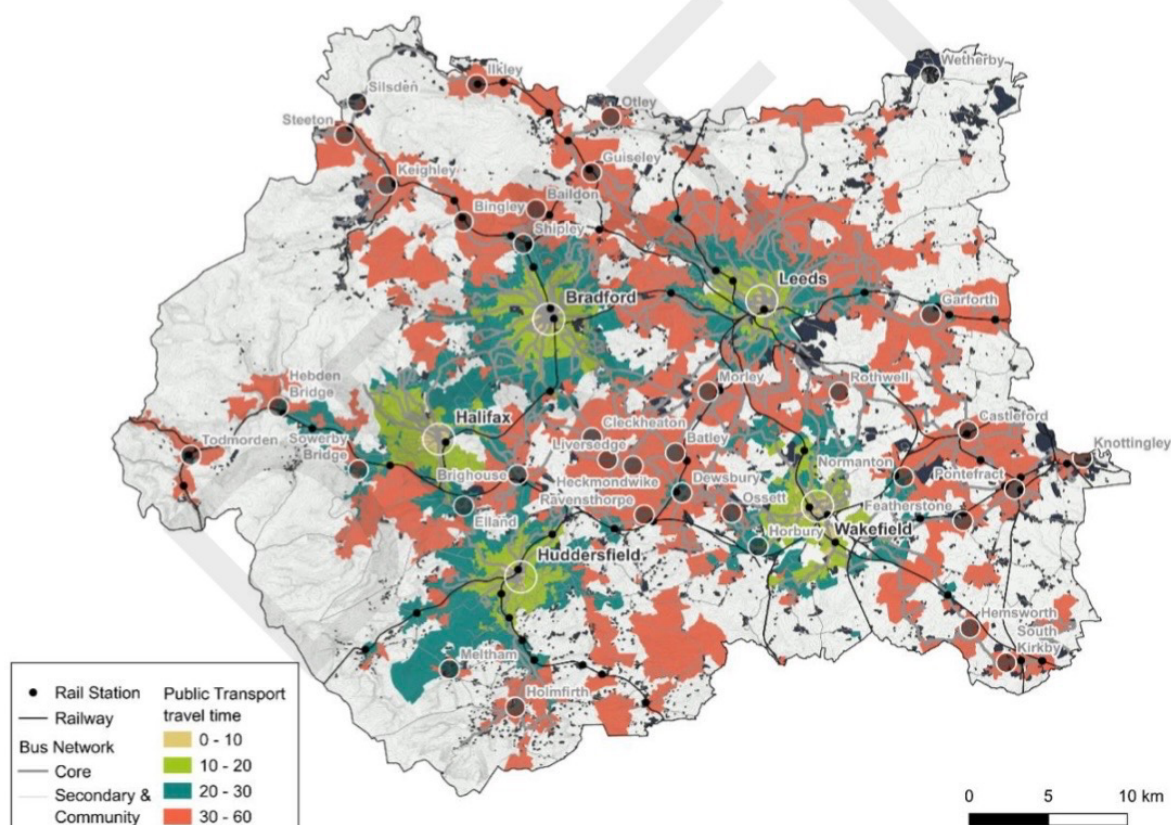
*It does not ensure the need to travel is reduced and that essential travel needs can be met by forms of sustainable transport other than the private car.*

The NPPF aims to ensure that homes jobs and local facilities can be accessed safely and conveniently by good transport links that reduce the reliance on the private car.

Cars are the preferred mode of transport within the village due to its isolated location and car travel is necessary for residents to access to facilities, shopping etc.

The below figure contained within WYCA’s recently released draft Local Transport Plan indicates the Upper Cumberworth is located within the least accessible of areas. The proposed upgrades to the public transport networks within West Yorkshire will not improve travel times within our area and are limited to betterments within higher population areas.

**Figure 22: Public transport travel times in West Yorkshire to nearest district centre**



<sup>16</sup> West Yorkshire Combined Authority Local Transport Plan Evidence Base. Available at: [The Mayor's West Yorkshire Local Transport Plan: Vision and Objectives | Your Voice](#)

<sup>17</sup> Core Network – services with a frequency of every 15 minutes on average or better, and primarily all operate on a commercial basis

- **Policy LP21 - the proposals do not demonstrate that they can accommodate sustainable modes of transport and be accessed effectively and safely by all users therefore does not comply**

*The NPPF states that all new development should be assessed in terms of their impacts on existing transport infrastructure impacts upon safety of all users and the impact in terms of encouraging sustainable transport modes*

*The local plan states that the council is committed to ensuring the new that new developments do not materially add to existing highway problems or undermine the safety of all users of the network.*

The sovereign junction is notoriously dangerous, and Carr Hill Road is a cut through for racing vehicles additional traffic movements would make matters worse especially once the quarry is active.

A second access off Park Lane is indicated on some plans. This junction is dangerous and not suitable for additional vehicle movements.

A pedestrian crossing on Carr Hill Road would be required for pedestrian safety.

The proposals would result in the loss of turning space for vehicles on Park Lane. Farm vehicles currently utilise the farmyard to turn so it is unclear as to how farm traffic will continue to access the landowner's other fields without having to reverse all the way up to Carr Hill Road which is of course a serious safety concern.

Turning space on Park Lane for refuse vehicles and farm vehicles alike needs to be provided within the scheme.

The boundary is shown to be incorrect on some plans and must be compared with the current adopted highway extent on Park Lane in particular.

- **Policy LP22 - the proposal does not incorporate minimum parking spaces with private cars therefore does not comply**

The proposal as shown with development occupying the farmyard would result in Lane Head Farm and the adjacent Weavers Cottage having no parking provision. Sufficient parking must be allowed for the farm and cottage within the site boundary.

Parking on the wider section of adopted highway alongside the existing barn cannot be relied upon as this area is frequently preoccupied by walkers and provides some turning space for vehicles servicing Park Lane.

- **Policy LP24 - the proposal does not enhance the character of the townscape heritage assets or landscape and negatively affects ecological networks therefore does not comply**

*Development does not contribute towards enhancement of the natural environment support biodiversity or connect to and enhance ecological networks and green infrastructure.*

*The scale of development should relate to neighbouring development consideration should be given to views vistas and skylines however this proposal does not.*

*The local plan seeks to protect and enhance the characteristics of the built natural and historic and environment and local distinctiveness which contribute to the character of Kirklees protect and improve green infrastructure and to support habitats allowing wildlife to flourish and to promote development that helps to reduce or mitigate climate change*

The development as proposed is entirely insensitive to any of the above objectives, it would cause ecological and landscape devastation and has shown complete disregard to any mitigation attempts. Such as large buffers, wildlife corridors or incorporation of sustainable drainage systems.

It would result in the residents having no option but to rely on car transport and it would require the continuous use of a pumping station, and the pollution risks relating to the foul drainage would be catastrophic.

- **Policy LP27 - the submitted FRA does not meet national planning policy and therefore does not comply**

The site specific Flood Risk Assessment is not in accordance with national planning policy, it does not take into account all sources of flooding and does not demonstrate that the proposal will be safe throughout the lifetime of the development.

The topography of the site is not representative within the submissions. A detailed topographical survey must be carried out in order to adequately consider the pre and post development drainage scenarios.

Local knowledge suggests drainage features exist on site which are not identified in the submitted drainage documentation. Local knowledge suggests that highway drains from Park Lane and Barnsley Road run through the site, these must be identified and protected including incorporation of the necessary no development stand-off.

Highway runoff regularly exceeds the capacity of the gully at the bottom of Park Lane, causing excess flows to flow overland into Lane Head Farm. Investigations must be carried out to establish where these flows are then directed to ensure flood risk from this source is not increased due to the development.

Similarly, the highway drains on Barnsley Road must be proven and adequately protected to ensure flood risk is not increased by the development.

Other drainage features are said to have been installed to protect neighbouring land from run off and to facilitate increased crop yield. Further investigations are required to identify all drainage assets within the field, ensure they are protected and prove that the development would not result in increased flood risk to the site, neighbouring land/properties or downstream.

The submissions suggest that the existing public combined sewer which flows through the site in a gravity system serves only the houses on Park Lane, this is incorrect, this system serves the village of Birdsedge and some of High Flatts and is already over capacity as evidenced only last week when a manhole upstream was surcharging polluted flows into the woods. Yorkshire Water did attempt to carry out remedial action but due to the unsustainable location on the narrow country lane, were unable to gain access. There are ongoing issues with the combined sewer overflow upstream any additional development would further increase the flood risk and pollution hazard.

The drainage documentation includes confirmation from Yorkshire Water that they do not have capacity to facilitate this development therefore it is unclear why the application is being progressed.

To go on to suggest the existing combined system is diverted to a foul water pumping station is beyond comprehension this would no doubt lead to regular pump failures which would result in flooding of polluted combined waste into ancient woodland causing major ecological harm and public health hazard. The energy use alone from this pump station deems this development unsustainable.

It should also be noted that the line of combined sewer indicated on the plans submitted does not correlate with public records and plot 123 fouls with the easement.

- Policy LP28 – The drainage proposals are not achievable therefore does not comply

As stated, a new outfall for surface water would be required across third party land and through ancient woodland. Permission does not appear to have been obtained from the necessary landowner, notwithstanding, the creation of an outfall would require ground works within the root protection areas of ancient woodland which is not acceptable. Additionally, this is a watercourse of high sensitivity which feeds the wildlife pond beyond and is of low flow or dry throughout much of the year. Considering all, or one of these points, it is clear that this site has no viable surface water outfall.

The proposals would *result in negative impact on local water quality and does not provide any improvements in water quality.*

The local plan states *that there is a general presumption against pumping surface water.* The existing combined system is indicated to be diverted towards a pump station which is clearly not acceptable.

*Development will only be permitted if it can be demonstrated that the water supply and wastewater infrastructure required is available or can be co-ordinated to meet the demand generated by the new development.*

Yorkshire water have confirmed that there is no capacity within the public sewer system to accommodate additional development. It is also understood that constraints due to infrastructure downstream would not allow the up sizing of the current system should that be suggested by the developer.

Additionally, the water supply network in the area is complicated and ageing, many properties are experiencing low water pressure and Yorkshire Water are regularly having to deal with leaks and other issues resulting in frequent disruption and road closures.

The developer does not propose to incorporate sustainable urban drainage systems and therefore the associated ecological and water quality benefits have not been provided for within this proposal which is shocking given the sensitive nature of the site and its surroundings and certainly would not comply with the drainage obligations to be imposed by the new NPPF.

- **Policy LP30 – the proposals would result in extensive and irreparable damage to the existing biodiversity of the land and its surroundings and therefore does not comply**

*As stated in the local plan The Council will seek to protect and enhance the biodiversity and geodiversity of Kirklees, including the range of international, national and locally designated wildlife and geological sites, Habitats and Species of Principal importance and the Kirklees Wildlife Habitat Network.*

*Proposals having a direct or indirect adverse effect on Ancient Woodland will not be permitted unless the benefits of the development can be clearly shown to outweigh the need to safeguard the local conservation value of the site or feature and there is no alternative means to deliver the proposal. In all cases, full compensatory measures would be required and secured in the long term.*

The proposals would result in significant loss and harm to biodiversity and has not been proven to provide net biodiversity gains. Nor does it seek to safeguard or enhance the function and connectivity of the adjacent Kirklees Wildlife Habitat Network, provide ecological links to the network or incorporate biodiversity enhancement measures to reflect the priority habitats and species within the immediate vicinity.

The ecological value of the area is of upmost regard amongst locals and visitors alike, the Ancient Woodlands are the hub of the community and is of the highest importance that this irreplaceable asset is protected for current and future generations and for the diverse an extensive range of flora and fauna that call it home. This field plays a key role to the function of the wild wildlife habitat network of which it forms part of.

That ecological information submitted does not meet standards; it fails to recognise or assess the true ecological value of the site and its surroundings and must not be relied upon. Key species are not even mentioned and the impact that the development would have upon the irreplaceable ancient woodland hasn't been considered.

The proposed development would result in irreversible harm to this functionally irreplaceable resource for biodiversity.

### **Effects of Development on Ancient Woodland**

#### Chemical effects

- Air pollution from roads or vehicles, log burners and barbeques etc
- Water pollution from urban runoff or pollution events, including foul water through pump failure
- Dust and soil pollution

#### Disturbance due to additional noise from

- Construction
- Street Roads
- Domestic dwellings
- noise from pets
- Fireworks and celebrations

#### Light pollution

- During construction
- Street lighting
- Car headlights
- Domestic lighting and garden lights

#### Trampling

- Due to more frequent activity
- More dogs
- Creation of additional informal access routes, this would result in the loss of additional dry stone walls which are also valuable habitats

#### Fragmentation

- Separation caused by development isolates habitats and limits wildlife mobility, the woods should be allowed to expand and thrive as evident along other boundaries where saplings have become established

#### Risks to wildlife due to additional domestic pets

- Cat predation which has been proven to extend c 400m
- Ecological effects due to flea tick and worm treatments
- Increased dog activity and fouling deters wildlife

#### Changes to hydrology

- The woods are currently fed by multiple springs, even in the summer months, to alter the drainage regime of the field would affect these water sources

There seems to be some serious confusion regarding buffer zones for Ancient Woodland. Buffer zones should be at least 15 metres from the boundary for root protection alone where other impacts extend beyond this distance a larger buffer is required.

A comprehensive risk based assessment is required. The Ecological Impact Assessment required must contain Acoustic & light Modelling, a Hydrological Assessment and consider recreational pressure.

It is understood that the environmental group have been liaising with academics who would look to study pre and post construction effects.

The White Rose Forest Project aims to increase canopy cover in the district by 30% and this field would be a perfect place to provide additional trees. Ancient woodlands store significantly more carbon per hectare than younger forests and ancient woodland soils are major carbon sinks storing vast amount of carbon over centuries. New planting adjacent to extend the woodland would provide additional canopy cover whilst offering protection and enhancement to the existing woodland.

- **Policy LP31 – the proposal does not ensure the protection and enhancement of biodiversity and ecological links within and connecting to the Kirklees Wildlife Habitat Network therefore does not comply**

The local plan seeks to prioritise *the safeguarding and enhancing green infrastructure networks green infrastructure assets and the range of functions they provide.*

Site lies within the River Dearne corridor The Council should *seek ensure that development proposals protect and enhance existing green infrastructure assets; minimise fragmentation of green infrastructure networks and maximise opportunities for new and improved green infrastructure and connecting links into the network where opportunities exist.*

It is concerning given the obvious value of the local and adjacent green infrastructure that the proposals indicate no regard or attempt to mitigate any impact of developing on this land.

It is noted that the proposals indicate the removal of great lengths of dry stone walls. Dry stone walls are vital linear ecosystems and wildlife corridors, offering diverse microhabitats for plants, animals, and insects. These structures provide shelter, nesting sites, and hibernation spots for species like birds, reptiles, and small mammals, while supporting biodiversity through moss and lichen growth.

Dry stone walls are characteristic of the area, have become established over many generations and must be retained and protected from harm.

- **Policy LP32 – the proposal would result in significant harm to the landscape character of the area and therefore does not comply**

The proposal does not take into account or seek to enhance the landscape character of the area it does not consider the setting, the landscape or the patterns of woodland trees and field boundaries.

The proposed development would be insensitive to the location and would not contribute to environmental objectives. Is it does it promote development to reduce and mitigate climate change all help in the transition towards a low carbon economy due to the sustainability issues already mentioned.

Neither does the proposal *protect or enhance the characteristics of the built natural and historic environment* or local distinctiveness which contributes to the character of Upper Cumberworth.

The lack of defensible boundary between the elevated position of the proposed development and the high sensitivity footpath namely the Dearne way has not been adequately considered. Adequate screening is not present.

The widely appreciated established vistas and long distance views would be severely impacted.

The view towards the Foothills of the Penines is the first and only glimpse view between the conurbations of Denby Dale and Upper Cumberworth. This is the only open long distance vista and must be retained in order to distinguish between the differing character areas. This view identifies the transition into the rural landscape; to lose this would cause significant to the landscape character of the area.

It should also be noted that artificial stone is only proposed to be utilised throughout the majority of the development and the dwellings proposed are of 2 storey construction which is not in keeping with the neighbouring properties which are predominantly bungalows.

- **Policy LP33 – the proposal both directly and indirectly threatens trees and Woodlands of significant amenity therefore does not comply**

The Local Plan states that *proposals should retain any valuable or important trees where they make a contribution to public community the distinctiveness of a specific location or contribute to the environment including the wildlife habitat network and green infrastructure networks*

The submitted Arboricultural impact assessment identifies multiple trees that the developer proposes to remove stating a conflict with internal layout, surely the layout should reflect the location of existing trees and be designed around them.

Section 4.1.14 Identifies an incursion on the RPA of group G5, a public footpath underlies these trees and any negative effect on their health would constitute a serious public safety risk. The layout should be revised to ensure sufficient stand off from all trees. A fall zone should be incorporated around all trees in the interests of public safety.

- **Policy LP34 – the proposal would result in significant harm to the water environment therefore does not comply**

*The Local plan states that proposals must ensure no deterioration of water courses or water bodies (including groundwater) by conserving and, where practicable enhancing, the natural geomorphology of water courses, water quality and the ecological value of the water environment, including the functionality of habitat networks.*

The proposal does not consider water availability from groundwater sources.

The adjacent ancient woodlands continue to thrive in this area due to the constant supply of water via springs fed from the field proposed to be developed. Any change to the local hydrology including the incorporation of hard surfacing and a formalised drainage system leading to a single point of discharge would irreversibly alter the current drainage regime and would be detrimental to the health of the woodland and the water supply that it relies on. These springs can be seen operating even when the watercourse has been dry for months.

The developer hasn't considered an infiltration based surface water disposal system and makes no effort to improve water quality through the incorporation of Sustainable Drainage Systems.

The proposal to direct surface water flows from the development's roads and hard surfaces via a single outfall into a high sensitivity low flow water course leading to a nature pond would no doubt cause serious ecological and pollution issues.

- **Policy LP35– the proposal would affect the setting of a designated heritage asset and therefore does not comply**

The development would harm and undermine the significance of Saint Nicholas' church and its contribution to the character of Upper Cumberworth. The much admired Village Vista which groups of walkers regularly stop to admire from the Dearne Way would be lost forever. The view towards the church spire has acted as a way marker for generations, since before the route was utilised for bringing Salt over from Manchester. The gap in the treeline between Lane Head Farm with it's adjacent Weavers Cottage and Stephen Woods perfectly frames this historical scene.

The woods contain the remains of a Medieval Water Mill, the original water supply for the village and various other historical features which fail to have been afforded sufficient consideration within the submissions.

*The conservation area of Upper Cumberworth is characterised by outstretching agricultural fields and an appreciation of the undulating rural panorama, synonymous with this area of Kirklees. Mature Trees and vegetation creates a tranquillity allowing time and space to contemplate and appreciate the historic setting of the grade II listed church and its surroundings. The Church of St Nicholas is an important and central focus of the conservation area. The tower was erected in the early 18<sup>th</sup> century, the Welsh slate roof is an interesting feature, differing in appearance to the predominantly stone slate roofs of the surrounding buildings.*

*From the elevated situation of Birdsedge and High Flatts, the clustered nature of the stone slated roofs and the church tower are an attractive historical and geographical point of reference in the distance. (Upper Cumberworth Conservation Area Appraisal, Kirklees Council)*

The weavers cottage adjacent to Lane Head Farm dating back to the 17th century, which is characteristic of the distinctiveness of Kirklees' historic environment has been afforded no consideration with modern out of character new builds constructed in artificial stone proposed only a few meters away completely out of character and severely affecting its setting.

- **Policy LP51– the proposal would result in an increase in air pollution which would have an acceptable impact on the natural and built environment and to people and therefore does not comply**

The unsustainable location of this development would result in a significant increase in car journeys which would increase the pollution to properties already at risk. By developing on the open space parallel to the existing properties this would enclose Barnsley Road, reducing the air space for pollutants to disperse and therefore increasing the risk to existing properties from both chemical and noise pollution.

The development would also result in increased air pollution which would impact on the natural environment. Development next to ancient woodland would result in chemical effects from air pollution from roads/vehicles and domestic activities such as barbecues, fires, fireworks and log burners. None of these effects have been addressed within the submissions.

- **Policy LP52 – the proposal would result in increased pollution from noise, vibration, light, dust, odour, shadow flicker, chemicals and other forms of pollution therefore does not comply**

As the local plan states *any consideration of the quality of land and potential impacts arising from development, possibly leading to an impact on health or ecological receptors is capable of being a material planning consideration.*

The proposals would increase noise, light, dust, odour, vibration and other forms of pollution as mentioned previously causing direct and indirect affects to the adjacent Irreplaceable Ancient Woodland.

The development would also cause severe issues during the construction.

Obtrusive light can present serious ecological problems. When the pump station fails and foul sewage is directed into The Woodlands this would present an ecological and public health hazard. Every day highway run off contains increased pollutants as compared to the current Greenfield runoff from an agricultural field.

Local plan recognises *that development can impact on the quality and quantity of water sources including groundwater.* This location is particularly sensitive because the ancient woodland depends on groundwater originating from the proposed development area for its existence.

Notwithstanding all of the above, the site is located in the Green Belt. *National planning guidance places great emphasis on the role and purpose of the green belt and states that the countryside it protects should be recognised for its intrinsic character and value. The NPPF states that great importances attached to greenbelts the fundamental aim of which is to prevent urban sprawl by keeping land permanently open. Within the Greenbelt there is therefore a presumption against development which would be harmful to the purposes of including land within it.*

*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 this application constitutes inappropriate development in the Green Belt and that no very special circumstances exist. Therefore the:

- Obvious harm to the visual amenity of the green belt
- Non-compliance with other policies listed above
- Insensitive design within a Green Belt setting
- Inconsideration to the amenity of neighbours
- Disregard to keeping any impact of openness to minimum

Which also apply to the proposals, do not require further discussion and the application should be refused.