

15TH FEBRUARY 2026

2025/60/93572/E

Land South of Barnsley Road, Upper Cumberworth, Huddersfield, HD8 8NN

Dear Sir/Madam,

I am writing to register my **strong objection** to the above planning application for a large housing development on land that is **designated as Green Belt** in the Local Planning Authority's (LPA's) adopted Local Plan.

Pl

This objection is based on number of concerns, including material planning considerations, and lived experience under the following key themes:

1. Inappropriate development of Green Belt
2. Foul drainage concerns
3. Surface water drainage concerns
4. Proximity to the Ancient Woodland with potential to cause irreversible damage to biodiversity
5. The loss of the tree protected by a TPO
6. Lack of real active travel options and increase in car use

1. Inappropriate development of Green Belt

I will start by stating that these fields are part of the Green Belt, but their importance goes far beyond that designation alone. Their position at the heart of the village makes them a defining element of the landscape and the character of Cumberworth and the wider Dearne Valley. They sit alongside cherished walking routes linking the village to the beautiful Upper Dearne ancient woodland, forming a natural, uninterrupted connection between community and countryside.

For me, and for so many others, these fields are more than open land, they are our green gateway, the place that tells us we are home. A housing development here would not only destroy the fields themselves but also



permanently erode the sweeping openness and the stunning line of sight that stretches across the surrounding Green Belt and woodland. It would remove a landscape that is deeply valued, both visually and emotionally, by the community it defines. Material planning considerations are set out below.

- **The Site is Designated Green Belt in the Kirklees' adopted Local Plan**

The application site lies within land designated as Green Belt, as defined in the adopted Local Plan. National guidance states that review and alteration of Green Belt boundaries should only take place, where necessary, as part of the plan-making process, and not through individual speculative applications.

This site has not been removed from Green Belt through any lawful Local Plan review, and therefore must continue to be afforded the full protection of its designation.

- **No Consultation Has Taken Place to Consider Removing This Land from the Green Belt**

Altering Green Belt boundaries requires a Local Plan review, which must include statutory public consultation. Evidence from Local Plan guidance shows that public involvement is essential when assessing or proposing changes to Green Belt allocations, and must follow the prescribed process. There has been no consultation on any proposal to remove this specific land from the Green Belt. Therefore, this application bypasses the required lawful and democratic process. This alone is a valid planning reason for refusal.

- **No "Exceptional Circumstances" Have Been Demonstrated**

The NPPF requires that exceptional circumstances must be "fully evidenced and justified" in order to alter Green Belt boundaries. However, exceptional circumstances can only be demonstrated by the Local Planning Authority through plan-making, not by a private developer. National guidance reinforces that reviewing or releasing Green Belt land must be evidence-based and strategic. The applicant has not provided, nor can they provide, the required LPA-level evidence. Therefore, the development conflicts directly with national and local policy.

- **The Development is Inappropriate and Harmful to the Green Belt**

Green Belt policy states:

- Inappropriate development is harmful by definition, and
- Development may only be approved in very special circumstances, where harm is clearly outweighed by other considerations.

A large housing estate does not fall within any acceptable or "not inappropriate" category such as agricultural buildings, outdoor recreation, or limited infilling. The proposal therefore constitutes **inappropriate development**, causing substantial harm to Green Belt openness and character.

- **Significant Harm to the Five Purposes of the Green Belt**



The NPPF identifies five purposes of Green Belt, including:

- Preventing urban sprawl,
- Safeguarding the countryside from encroachment, and
- Preserving openness.

This development would:

- Extend built form into open countryside,
- Contribute to urban sprawl,
- Reduce both the physical and visual openness of the area.

This is precisely the type of harm Green Belt designation is intended to prevent.

- **Failure to Demonstrate that Alternatives Have Been Considered**

Guidance for objecting to new Local Plan proposals emphasises that authorities must show they have fully explored alternative housing delivery approaches, including brownfield reuse, densification, and redevelopment of underused land. No such assessment has been provided. The application therefore fails to justify why Green Belt land should be used when alternatives have not been exhausted.

For the reasons outlined above, the proposal is in clear conflict with national policy, Green Belt protections, and proper plan-making processes. Specifically, the development:

- Lies on designated Green Belt land with **full policy protection**
- Has **not undergone required public consultation** for Green Belt boundary change
- Lacks any **exceptional circumstances**
- Constitutes **inappropriate development** causing harm to openness
- Undermines the **purposes of the Green Belt**
- Has **not demonstrated that alternatives have been considered**

2.Foul drainage concerns

After reviewing drawing **E25/8281/001** submitted by the applicant, I have serious concerns regarding the proposed foul drainage arrangements. The plans indicate a gravity-fed foul sewer network leading to a pumping station at the southeast corner of the field, with wastewater then pumped back upslope to the existing combined sewer on Barnsley Road.

As someone working within the water industry, I am acutely aware that pumping stations inevitably fail—whether through mechanical breakdown, power failure, blockage, or storm conditions. Yet the submitted plans show no provision for managing foul flows in the event of such a failure. There is no emergency storage, no



overflow containment, and no fail-safe system indicated on the drawing. Aside from perhaps the attenuation tank overlying the playground??

Given the topography, a pumping station failure would leave only one outcome:

raw sewage would discharge directly downslope into the adjacent ancient woodland and into the receiving watercourse (Park Dike), which forms a tributary of the River Dearne. This watercourse is part of the Dearne from Source to Bentley Brook Water Body, protected under the Water Environment (Water Framework Directive) Regulations 2017. Such a failure would cause severe deterioration of water quality, with harmful impacts on aquatic ecology, riparian habitats, and the safe recreational use of the stream.

One of the gravest concerns is the location immediately downstream: a well-known paddling spot used by children and animals, where the public footpath crosses the stream and passes over the small waterfall at approximately SE 21196 08345. Any release of untreated sewage at this point would pose a significant and immediate public-health risk, alongside long-term environmental damage.

3.Surface Water Drainage Concerns (Drawing E25/8281/001)

I have significant concerns about the proposed surface water drainage strategy, both during construction and in the long-term operation of the development. From regularly walking by these fields, I am familiar with how they naturally drain in wet weather, the presence of surface runoff, informal drainage channels, and springs that emerge and flow directly into the surrounding woodland. Even under current greenfield conditions, these features rely on natural attenuation from soils, vegetation, and underlying geology.

Replacing this landscape with a major urban development introduces a substantial risk to both the quantity and quality of water entering the tributaries of the Upper Dearne catchment. The plans submitted do nothing to alleviate these concerns.

There is no visible detail regarding how surface water will be safely managed during the construction phase. Given the high ecological sensitivity of the downstream ancient woodland and watercourse, this omission is extremely serious. Construction runoff, if unmanaged, would rapidly convey sediment, pollutants, and contaminants into protected habitats.

For the permanent operational phase, the drainage drawings show surface water being piped downslope and discharged into Park Dike, within St Stephen's Wood, the ancient woodland itself. For the reasons already outlined, this poses a high risk to water quality, ecological integrity, and recreational safety within the watercourse.

Crucially, the plans do not include any Sustainable Drainage Systems (SuDS). There is no evidence of attenuation, filtration, infiltration, or treatment prior to discharge. Under current conditions, natural soils and vegetation provide significant slowing, filtering, and storage of runoff. If the land is converted from arable to



largely impermeable housing, runoff will become far more rapid and direct, increasing flood risk and creating a clear and immediate pathway for pollutants to reach the watercourse.

An urbanised catchment would also introduce new pollutants that do not currently exist on this site, including car-related oils and detergents, de-icing salts, cleaning products, and general urban runoff. Without SuDS, these contaminants would enter the watercourse untreated.

A housing estate upslope will inevitably alter the ancient woodland's hydrological regime, through increased runoff volume, diversion of surface water, pollution input, sedimentation, and reduced infiltration. These changes are known to degrade ground flora, fungi, and soils, all of which are fundamental to the ecological integrity and irreplaceable value of ancient woodland.

The sensitivity of ancient woodland soils to hydrological change is well recognised. Their undisturbed structure and ecology make them extremely vulnerable to polluted or accelerated runoff, and professional guidance consistently emphasises the need to avoid chemical, hydrological, and pollution impacts through robust assessment and design.

In summary, the drainage proposals as submitted are incomplete, high-risk, and incompatible with the protection of ancient woodland and downstream water environments. The absence of SuDS, the lack of construction-phase controls, and the direct discharge to a sensitive watercourse create an unacceptable level of environmental harm.

4. Proximity to the Ancient Woodland with potential to cause irreversible damage to biodiversity

St Stephen's wood is ancient woodland, with protections by law. It is a haven for wildlife, and biodiversity. It is a stunning and much-loved beauty spot. Ancient woodland is defined by Natural England and the Forestry Commission as **irreplaceable**. It is protected due to its rare species, undisturbed soils, cultural and landscape value.

The National Planning Policy Framework (NPPF) states that development causing loss or deterioration of irreplaceable habitats (including ancient woodland) should be refused unless there are *wholly exceptional reasons* and a suitable compensation strategy. Any development immediately adjacent to ancient woodland is highly likely to degrade the habitat through edge effects, changes in hydrology, soil disturbance, and loss of ecological integrity.

Good practice guidance states that adequate buffers must be provided to protect ancient woodland from noise, light, trampling, predation by pets, and other edge effects. The proposed development does not provide a substantial, ecologically justified buffer, it risks direct and indirect harm to the woodland's ecological functioning. New housing developments bring additional vehicles, heating outputs, construction dust, and potential chemical runoff, all of which can degrade sensitive woodland ecosystems.



NPPF explicitly states that any deterioration should be refused unless wholly exceptional reasons exist. Housing developments are not considered “wholly exceptional” (the term is typically reserved for infrastructure such as nationally significant utilities or transport), so the application fails NPPF tests.

5.The loss of the trees and tree protected by TPO

The plans currently show no avoidance of the trees in the fields selected for development. The ‘broccoli tree’ has a Tree Preservation Order (TPO). The trees have multiple benefits: carbon sequestration, habitat for multiple species, air quality improvement, water regulation, let alone being important local landmarks. I don’t believe there are any exceptional circumstances or needs proven for removing any of these trees.

6.Lack of real active travel options and increase in car use

The Active Travel Assessment and Active Travel Plans submitted by the applicant are incorrect and misleading. In the table which lists ‘Destinations within acceptable walking distances’ the distances are completely incorrect. For instance, when calculating the distance from the area of development to the nearest train station, by my calculations (even when generously using the nearest boundary of the site on Barnsley Rd) – the walking distance to the station is >1000m. And the ‘whole town of Denby Dale’ is not within 2000m. At least half the main high street including the library is >2km walking distance.

As a resident of Upper Cumberworth, commuter and advocate for active travel I know the realities of trying to get to work by walking, cycling and public transport through lived experience. It simply isn’t practical. And for those with children who also need to be dropped at daycare/school or those with caring responsibility, it’s totally unfeasible within most working hours. The bus service in the area remains very limited, infrequent and unreliable. The train station is not a suitable walking distance. Cycling on Barnsley road, is unsafe for all but the most confident, hardy, seasoned road cyclists (and that’s just in summer!). The reality is there would be a huge increase in car use in the area if this new development went ahead, and no active travel provision for the new residents other than a token ‘plan’ pointing them to services they will find to be lacking or impractical.

Closing remarks

I grew up in the HD8 area, and after years living in different parts of the country, I chose to return to Upper Cumberworth to raise my own young family. This place is special. Its small village character and the beautiful countryside that surrounds it are the very reasons we came back, and the same reasons friends and family love to visit, walk by these fields, explore the ancient woodland, and support local businesses along the way.

The land in question, and the paths around it, are woven into our family’s history. We have watched our children grow up here, from babies in hiking carriers to toddlers splashing in puddles, to young kids discovering wildlife and pointing out the “broccoli tree” on our walks. The area has been the setting for scavenger hunts, nature trails, and school wellbeing walks. Our family albums are full of photos with this land in the background.

The thought that this landscape could be lost is deeply upsetting, not just for us, but for many local families who value it as part of their daily lives, memories, and sense of home.



Given the planning harm outlined above, allowing this development to proceed would not only erase a cherished part of our community, but would undermine the integrity of the planning system itself.

