

## DC Admin

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**From:**  
**Sent:** 09 March 2026 18:31  
**To:** DC Admin  
**Subject:** Planning objection - 2025/60/93572/E – Land of Barnsley Road, Upper  
Cumberworth HD8

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Objection to Planning Application 2025/60/93572/E – Green Belt Land of Barnsley Road, Upper Cumberworth HD8.

Dear Sir / Madam,

I write to formally object to the above planning application for residential development on land designated as Green Belt of Barnsley Road, Upper Cumberworth as a local resident.

This objection is made with reference to the National Planning Policy Framework (NPPF), the adopted Kirklees Local Plan (2019), and the Kirklees Green Belt Review (April 2017), which forms a key part of the Local Plan evidence base.

### 1. Conflict with the Kirklees Local Plan and Plan-Led Decision Making

The application site lies within land designated as Green Belt under the adopted Kirklees Local Plan. Policy 19 and Policy 19.1.1 (Development in the Green Belt) establish a clear presumption against inappropriate development, reflecting national Green Belt policy.

The Kirklees Local Plan was informed by a comprehensive district-wide Green Belt Review, undertaken to determine whether exceptional circumstances existed to justify altering Green Belt boundaries through the plan-making process. The outcome of that review is reflected in the adopted allocations and retained Green Belt boundaries.

This application seeks to promote residential development on Green Belt land outside the plan-making process, contrary to the plan-led approach required by Section 38(6) of the Planning and Compulsory Purchase Act 2004.

### 2. Evidence from the Kirklees Green Belt Review (April 2017)

The Kirklees Green Belt Review confirms that the fundamental purpose of the Green Belt in Kirklees is to prevent urban sprawl by keeping land permanently open, with openness and permanence identified as its essential characteristics.

The Review applied a sequential testing methodology, including assessment of the degree of constraint to development, performance against the five Green Belt purposes, and consideration of brownfield and non-Green Belt alternatives.

The fact that the application site remains designated as Green Belt in the adopted Local Plan demonstrates that it was not identified through the Review process as suitable for release. No new evidence has been provided to demonstrate that circumstances have materially changed since adoption of the Plan.

### 3. Inappropriate Development and Lack of Very Special Circumstances

Paragraphs 152 and 153 of the NPPF confirm that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances.

The Green Belt Review confirms that housing need alone does not constitute exceptional or very special circumstances, as housing requirements were fully considered during the Local Plan process.

The application fails to demonstrate any very special circumstances capable of clearly outweighing the harm to the Green Belt.

### 4. Harm to Green Belt Purposes and Openness

Consistent with NPPF Paragraph 138 and the findings of the Green Belt Review, the proposed development would result in encroachment into open countryside, undermine the permanence of the Green Belt boundary, and cause a permanent loss of openness through built form, curtilage, infrastructure and activity.

### 5. Circumvention of the Green Belt Review Process

Paragraph 143 of the NPPF makes clear that Green Belt boundaries should only be altered through the preparation or review of a Local Plan. Allowing this proposal would undermine the integrity of the Kirklees Green Belt Review and the adopted Local Plan.

### Conclusion

This is not grey belt nor provisional open land, this is greenbelt.

Greenbelt land is easier, cheaper land to develop so will always be attractive to developers who wish to maximise financial returns and shareholder value.

However, greenbelt also has a purpose and once it's been built on its gone for good. We also have to be very careful that this development and application doesn't become a precedent that drives legal challenges and unstoppable greenbelt development throughout the Kirklees region by other larger developers with much deeper pockets.

This is not a case of 'not in my back yard' but rather identifying appropriate brownfield land to develop in the local area rather than making a quick buck at the expense of local communities and land that should be maintained for future generations.

For the reasons set out above, the proposal is contrary to the National Planning Policy Framework, the Kirklees Local Plan (2019), and the Kirklees Green Belt Review (April 2017). The application should therefore be refused.

Kind regards,