



### 1. Harm to the Green Belt

The site is designated Green Belt within the Kirklees Development Plan. Development of 123 dwellings would:

Result in inappropriate development within protected countryside  
Cause loss of open, agricultural land currently used for grazing  
Undermine the purposes of the Green Belt by contributing to sprawl, encroachment and loss of landscape character

No very special circumstances have been demonstrated to justify the impact on the Green Belt.

### 2. Traffic and Highway Safety Concerns

The development would significantly increase traffic on surrounding roads including Barnsley Road (A635), Carr Hill Road and Cumberworth Lane. Residents have already highlighted that:

Carr Hill Road lacks continuous footpaths, creating hazards for pedestrians  
Existing congestion at the Sovereign junction is severe at peak times  
Many vehicles already travel at high speeds on narrow roads  
Winter conditions due to the site's elevation may cause residents to park on the A635, worsening safety risks

These factors raise serious concerns about pedestrian and road-user safety, especially for school children waiting for buses on Barnsley Road.

### 3. Impact on Ancient Woodland

The site borders Stephen Wood, a designated ancient woodland. While the plans show a 10 metre buffer, the Woodland Trust recommends at least 50 metres to avoid long term ecological harm. A buffer below this threshold risks damaging the woodland's biodiversity and natural integrity during both construction and occupation.

### 4. Questionable Local Need for the Proposed Housing

Market evidence from local residents indicates that there is no shortage of available housing in the area:

Over 900 homes currently for sale within 5 miles of the site  
More than 300 of these are below £250,000 (starter home range)  
New-build units in nearby Denby Dale remain unsold since mid 2025

This suggests there is not a demonstrated local demand that would justify development of this scale in a Green Belt location.

### 5. Drainage and Flooding Concerns

A natural water culvert runs diagonally across the site. Local representations state that this feature does not appear correctly in the applicant's plans. Disturbance to this culvert may increase the risk of flooding both on-site and downstream in Denby Dale.