

I object to this outline application for up to 123 dwellings.

1. Inappropriate Development in the Green Belt

The site lies within the designated Green Belt. Under the National Planning Policy Framework (paragraphs 137–151), the construction of new buildings in the Green Belt is inappropriate development and should not be approved except in “very special circumstances.” These circumstances must clearly outweigh the harm to the Green Belt.

The proposal would cause substantial harm to openness through the introduction of a large housing estate, associated infrastructure, and domestic paraphernalia. It would also conflict with the fundamental Green Belt purposes, particularly safeguarding the countryside from encroachment and preventing urban sprawl. No robust case for very special circumstances has been demonstrated.

This directly conflicts with the Kirklees Local Plan, including Policy LP12 (Green Belt), which resists inappropriate development unless strict national policy tests are met.

2. Harm to Landscape Character

The site forms part of an open agricultural landscape that contributes to the rural setting and identity of Upper Cumberworth. The scale of development proposed—up to 123 dwellings—would introduce a significant urbanising effect, eroding the settlement’s character and resulting in visual harm to the wider landscape.

This is contrary to Local Plan policies such as LP1 (Presumption in Favour of Sustainable Development) and LP35 (Countryside), which seek to protect landscape character and the intrinsic beauty of the countryside.

3. Impact on Ancient Woodland and Ecology

The site lies adjacent to ancient woodland, an irreplaceable habitat afforded the highest level of protection under paragraph 186 of the NPPF. Development resulting in the loss or deterioration of such habitats should be refused unless there are wholly exceptional reasons.

The proximity of this development poses clear risks of indirect harm, including recreational pressure, noise, lighting, pollution, and hydrological impacts. The field itself likely functions as a buffer and wildlife corridor, and its loss would further degrade ecological networks.

The proposal conflicts with Local Plan Policy LP30 (Biodiversity and Geodiversity), which requires protection and enhancement of ecological assets, and fails to demonstrate a meaningful biodiversity net gain.

4. Absence of Justification for Development in a Constrained Location

The applicant has not demonstrated that housing need cannot be met on less sensitive, non-Green Belt sites. Housing delivery does not, in itself, constitute very special circumstances sufficient to override Green Belt and ecological protections.

Conclusion

The proposal constitutes inappropriate development in the Green Belt, causing clear harm to openness and landscape character, and poses unacceptable risks to ancient woodland and biodiversity. It conflicts with both the NPPF and the Kirklees Local Plan. Planning permission should therefore be refused.